

Section 4

General Operations Plan - Material Recovery Facility

***Gold Medal Environmental of
DE, LLC
Resource Recovery Facility
Single Stream and C&D Recyclable Materials***

Operations Plan

Revised March 2017

Prepared For: Gold Medal Environmental of DE, LLC

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Forms and Documentation for Procedures for Pre-Qualification and Acceptance Suspected Asbestos-Containing Materials (i.e., Asphalt Shingles/Drywall)

1.0 FACILITY OVERVIEW

1.1 Purpose and Overview

This Operations Plan (the “Plan”) has been prepared by Compliance Plus Services, Inc. (“CPS”) pursuant to the requirements specified in Section 4.4.1.3 of the Delaware Regulations Governing Solid Waste (“DRGSW”) for the Resource Recovery Facility (“RRF”) operated by Gold Medal Environmental of DE, LLC (“Gold Medal”). The Gold Medal RRF operation currently accepts both source separated and commingled (“single stream”) recyclable materials, specifically glass, paper, plastic and metal, under an existing Resource Recovery Permit (Permit No. SW-03C17) issued by the Department of Natural Resources and Environmental Control (“DNREC” or the “Department”). The RRF commenced operating after the issuance of the original permit on March 1, 2012 (originally SW-03B17 issued under Blue River Resources, LLC). On August 10, 2015 the permit was transferred to Gold Medal Environmental of DE, LLC as permit #SW-03C17. The Gold Medal facility provides capacity for single stream recyclable materials and C&D wastes to business and institutional facilities.

A principal objective of the facility is to establish strong reliable regional markets for its recycled commodities. Gold Medal currently accepts materials that include recyclable materials from construction and demolition (“C&D”) projects, including bulk aggregates (e.g., brick, block, stone, concrete, asphalt etc.), asphalt shingles, wood/lumber and drywall. These additional C&D recyclable materials may be accepted individually (i.e., as separate shipments containing only single segregated recyclable materials such as wood or drywall (or shingles, etc.) or the materials may be commingled as C&D recyclable materials from a C&D project. C&D recyclable materials will be accepted and processed separately from single stream recyclable materials at the facility to produce bulk commodities or feed stock materials for other recycling centers.

A prime source of single stream recyclable materials come from commercial and industrial enterprises, such as educational institutions, commercial shopping areas and industrial businesses that have programs for recycling materials.

The facility is located at 1000 South Heald Street in Wilmington Delaware. The facility comprises an eight (8) acre parcel located approximately a ½ mile north of Interstate I-495 and the Route 13 interchange. This Operations Plan provides detailed information on the controls and procedures that have been implemented at the Gold Medal facility, including those specific management and handling procedures related to C&D recyclable materials that meet the requirements of Section 4.4.1.3 as well as the applicable portions of Section 9.0 of the DRGSW. The Operations Plan has also been developed to ensure that all operations conducted are in compliance with all applicable Federal, State and local laws and regulations pertaining to Resource Recovery Facilities.

1.2 General Description

The facility was issued a Resource Recovery Facility Permit (No. SW-03C17) on July 17, 2015 by the Delaware Department of Natural Resources and Environmental Control (“DNREC”) to accept, process, and store source separated and single stream recyclable materials for bulking and transfer offsite as either a commodity or a recyclable material for further processing at another recycling facility and construction and demolition debris, for the purposes of recycling (see Attachment IV). Currently, the facility is permitted to accept paper, cardboard, plastic, metals, glass (clear and colored), drywall, wood products, non-asbestos containing asphalt shingles, and aggregates (e.g. brick, block, stone, concrete, etc.). C&D materials have a market value as either bulk commodities or as feed stock for other recycling facilities to produce a final product. Gold Medal processes both single stream and C&D recyclable materials using physical and/or mechanical sorting, separating and sizing techniques.

This Operations Plan addresses both of the approved recycling operations.

The current site comprises approximately 8 acres of land that is a restored brownfield property (Tax Parcel #10-001.00-047) referred to as the West Parcel of the BUDD Metal Site (DE-0270). The property, as shown on Site Plan Drawing SP-1 (see Attachment 1), includes a large 70,000 square foot processing area in Process Building No. 1, with an additional 693 square feet of processing area to be developed in proposed Process Building No. 2. Adjacent to Process Building No. 1 is a 6,000 square foot office building to support administrative and management functions at the site. These existing buildings are used to support existing recycling operations. The facility's operating yard provides suitable access and supports unobstructed movement of equipment and trucks at the site. The facility has two truck scales, also shown on Site Plan Drawing SP-1, to provide appropriate measures to monitor and track material receipts and shipments at the facility.

The facility will continue to receive source separated, single stream and C&D recyclable materials for bulking and transfer offsite as a commodity, or as a recyclable material for further processing at another recycling facility.

The Gold Medal facility is designed to separate or process up to 234,000 tons of recyclable materials per year into marketable recycled products or commodities, including but not limited to, bimetallic cans, aluminum cans, newsprint, paper, plastics cardboard, aggregates, asphalt shingles, drywall and wood products.

1.2.1 Property Owner

The property located at 1000 South Heald Street, Wilmington, Delaware 19801, where the Gold Medal RRF is operated, is currently owned by Heald Street, LLC.

1.2.2 Lease Agreement

The 1000 South Heald Street property is leased to Gold Medal Environmental of DE, LLC, by Heald Street Partners, LLC. A copy of the lease agreement and a lease

agreement amendment is provided in Section 3 of the facility's 2016 resource recovery permit renewal application.

1.2.3 Former Site Remediation and Engineering Controls

The current facility is located at a restored brownfield site referred to as Operable Unit 2 (OU-2): West Parcel of the former BUDD Metal Company. As part of the restoration, a Remedial Completion/Closeout Report was approved by DNREC's Site Remediation and Restoration Branch ("SIRB") on April 21, 2011. The former remedial activities conducted at the site included soil stabilization and the installation of an engineered cap at the site comprised of a layer of aggregate material, comprised of crushed concrete and/or asphalt pavement throughout the property. These engineered controls provide both protection to onsite workers from exposure to subsurface soils and also provides onsite environmental protection and operational controls to minimize potential impacts at the site from the current and proposed operations. A Site Plan Map (Drawing No. SP-1, prepared by CPS, dated September 28, 2016) is provided in Attachment I that depicts the site boundaries and materials of construction of the exterior portions of the site.

1.3 Recyclable Materials Marketplace Overview

1.3.1 Commercial and Institutional Recyclable Materials

As referenced in Section 1.2 above, the facility is currently approved to accept source separated and single stream recyclable materials for bulking and transfer to markets. The facility will continue to provide this service to commercial and institutional facilities for the current recyclable materials listed in Gold Medal's RRF Permit. Additionally, the facility is permitted to accept C&D recyclable materials from these types of establishments as defined in 1.3.3 below. This allows Gold Medal to provide additional local recycling alternatives to these entities and increase their ability to divert solid wastes from disposal consistent with resource recover goals.

1.3.2 Industrial Recyclable Materials

The facility intends to continue to provide processing of recyclable materials to industrial generators that have materials such as cardboard, or metal that lends themselves to bulking and shipment offsite as a salable commodity.

Gold Medal is also able to provide additional recycling options to these clients by accepting commingled recyclable materials for separation and processing such as commingled cardboard and plastic from certain commercial generators and/or metals from industrial activities.

Moreover, the facility's acceptance of C&D recyclable materials, as described in Section 1.3.3 below, offers these industrial customers additional opportunities to recycle.

1.3.3 Construction and Demolition Recyclable Materials

Gold Medal is able to accept C&D recyclable materials, specifically, dry wall, wood/lumber materials, asphalt shingles, and aggregates (e.g., brick, block, rock, stone, concrete, etc.). These materials are accepted at the facility primarily in bulk and will be screened and sorted at the facility to generate bulk recycled commodities and/or feed stock materials to produce final products. The limited range of C&D recyclable materials selected for recovery by Gold Medal are materials which have well established markets and client demand. This will help to sustain the facility's operations.

C&D recyclable materials may be generated from any residential, commercial, institutional or industrial C&D projects. These materials will be accepted and processed separately from single stream recyclables currently managed at the facility.

However, similar materials may be combined for final processing or packaging prior to shipment offsite for final recycling at another permitted recycling facility.

1.4 End Market Users

End market strategies for Gold Medal include establishing reliable high quality separated materials for sale to various markets. The strategy requires the use of local and regional facilities as well as domestic and international end users that can recycle or reuse the separated material in production of new products. A summary list of examples of the end market users that Gold Medal has identified is provided in Attachment II.

1.5 Out-Throws

The primary objective of the Gold Medal facility is to ensure that the separated commodities to be sold to various manufacturers and end users are of high quality materials with minimal contamination (non-recyclable components). During the recovery process, residual materials, referred to in this Plan as “out-throws”, are generated. Out-throws are composed of either non-recyclable or low quality materials, that have limited or no market value, or materials which are recoverable but are not composed of the materials identified in Gold Medal’s current RRF permit. These materials must be managed separately and sent offsite for disposal at an approved facility, or sent offsite for further recycling or recovery. It is the goal of the facility to minimize the amount of out-throws that are generated during resource recovery operations. Accordingly, Gold Medal maintains a maximum out-throw percentage rate of 20% for single stream recyclable materials and 40% for C&D recyclable materials.

2.0 SITE ENVIRONMENTAL SETTING

2.1 Site Location

The site is located at 1000 South Heald Street, Wilmington, DE, 19801. The site is approximately ½ mile north of the I-495 and Route 13 Interchange. A site location map of the area and an aerial map of the site are provided in Attachment I.

2.2 Surrounding Land Use and Topography

The site is located in the HI, heavy industry, zoning district. The site is surrounded by other heavy industrial facilities. The nearest residential property is located less than 0.25 mile to the east of the property boundary and across New Castle Avenue, Route 9. Additionally, there are other significant industrial facilities located between the current recycling facility and the nearest residential area. A U.S.G.S. topographic map of the area surrounding the site is provided in Attachment I.

2.3 Water Resources

2.3.1 Onsite Water Supplies

The facility is served by public water and sewer. The water supplier is Artesian Water Company, which has the infrastructure to supply ample water to the facility to meet all operational needs.

2.3.2 Surface Water Bodies

There is no water bodies (ponds, lakes, rivers) located on the site. The facility lies approximately 150 feet southeast of a stormwater retention pond adjacent to the Suburban Waste Services, Inc. and Maddox Concrete Co., Inc. sites.

2.3.3 Groundwater

Groundwater is not currently being used onsite for a supply of process or potable water. Based on the information provided in the Hydrogeological Assessment, previously provided to the Department, the depth to groundwater is generally at 3.5 to 4.0 feet below the grade surface. As described above, an engineered cap has been installed at the site to protect onsite groundwater from surface and subsurface impacts.

2.4 Surface Drainage and Stormwater

2.4.1 Designated Floodplain Areas

As shown on the facility Site Plan Drawing (SP-1) provided in Attachment I, the site is located within the 100 year floodplain. A copy of the Federal Emergency Management Agency (“FEMA”) Flood Insurance Rate Map dated February 4, 2015 for this area is provided in Attachment I.

Although the site is located within the 100-year floodplain area, all recyclable materials will only be received and processed inside of one of the Process Building, No. 1 and No. 2. Storage of recyclable materials, residual out-throws and recycled products/commodities are also primarily limited to the inside of Process Building No.1. Gold Medal does have outdoor storage areas, as depicted on the Site Map SP-2, that are utilized at the facility to stage containers of recycled products or commodities that are eventually sent offsite for sale or reuse.

Outside Storage Areas are used to stage up to two (2) roll-off containers of segregate recycled materials (one for wood and one for metal), and to stage up to five (5) enclosed containerized units, such as trailers (e.g.; box vans or walking floor units) and/or roll-off containers of recycled product/commodities. In the event, or likelihood, of a 100-year storm, Gold Medal will either move these containers inside Process Building No. 1, or take the containers offsite to their destination location or another suitable location outside the 100-year flood plain. A Process and Storage Area Location Map is provided in Attachment 1, Drawing No. SP-2 prepared by CPS, dated 9/28/2016), that provides a depiction of the locations where materials are managed at the site.

The walls and roof of both Process Buildings serve to ensure that recyclable materials are not handled in the 100 year floodplain. Each building is also equipped with overhead metal roll up doors that can be closed immediately to ensure that water will not enter the

building and materials stored inside will not be carried outside the building in the event of a flood.

2.4.2 Stormwater

The site is covered with crushed concrete aggregate which was placed as part of a site capping project under the remediation activities referenced in Section 1.4 above. In addition to the concrete, certain portions of the property have been paved with asphalt pavement. These portions of the property that have been paved are the sections near the Main Process Building, where a higher frequency of truck traffic is expected. The crushed concrete and pavement will serve to minimize the potential for erosion throughout the site.

The site is graded to direct stormwater via sheet flow offsite toward the municipal stormwater management system. The majority of the property drains toward South Heald Street where the stormwater is captured by the municipal stormwater system. A smaller portion of the property located at the rear of the facility drains toward the southeastern property line.

The Gold Medal operation is designed to minimize potential exposure of materials to precipitation. This is accomplished by keeping all recyclable materials inside the Processing Building(s) or stored in trailers or covered roll-off containers to keep the material from being exposed to stormwater. This includes the offloading, processing and storage of all incoming recyclable materials and process out-throws. Recycled products/commodities are principally managed and stored inside Process Building No. 1.

2.5 Wetlands

There are no freshwater or intertidal wetlands habitats on the site.

2.6 Nuisance Dust, Odors and Vector Controls

2.6.1 Dust Management

Due to the nature of the materials to be accepted at the RRF Facility, dusts are not expected to be generated in any significant quantities during storage, handling or processing. As stated previously, all material unloading and processing occurs indoors in the two Process Buildings. Outdoor storage will consist of solely containerized recyclable materials including metal and wood, and other authorized recyclables that are not expected to generate or produce any significant fugitive dusts (see Drawing No. SP-2, Attachment I).

Accordingly, dust from material handling activities are not expected to create a nuisance. If dust becomes an issue in the future, Gold Medal will take corrective measures to prevent dust from becoming a nuisance. This could include wetting stored materials, installation of a misting system or other handling procedures to prevent dust.

2.6.2 Odor Control

As with dust, odors are not expected to be to be an issue due to the types of materials that will be recycled at the facility. The recyclable materials accepted by the facility are not expected to contain liquids or putrescible wastes. In addition, many of the recyclable materials received at the site are processed and baled immediately after receipt. Consequently, there is minimal opportunity at the site for odors to develop. The facility storage and process areas will be inspected once each operating day. During this inspection, if any odors are detected that may cause an off-site nuisance; the odors will be reported to the Facility Manager who will be responsible for prompt mitigation of any odor source(s).

2.6.3 Vector Attraction Reduction

Gold Medal will conduct a daily site inspection of the facility at least once each operating day. During that inspection, potential for nuisance organisms will be monitored. Any potential habitat or population of nuisance organisms will be reported to the Facility Manager. The Facility Manager will be responsible for prompt corrective action to eliminate the potential for nuisance vectors.

2.6.4 Litter Control

Good housekeeping practices will be utilized to minimize litter at the facility. Monitoring the facility grounds for litter will be part of the daily facility procedures. If litter is observed during the daily site inspection, litter will immediately be collected and placed in the appropriate container for subsequent disposal at an approved disposal site.

2.7 State and Local Permits

A copy of all applicable state and local permits required to operate the facility will be kept in the Facility Manager's office. This information will be made available for review by the Department upon request.

3.0 FACILITY DESCRIPTION AND ENVIRONMENTAL MANAGEMENT CONTROLS

3.1 Facility Layout and Design

The Gold Medal RRF operation is designed to quickly and efficiently: 1) receive recyclable materials; 2) process and segregate the material into individual commodity groups to meet end market criteria and requirements; and 3) ship the recovered materials out to their final end users to meet the market needs. The facility design and environmental controls are intended to satisfy the minimum design requirements specified in Section 9.3.4 of the DRGSW.

The facility layout, as depicted in Drawing No. SP-2 is included in Attachment I. As shown in Drawing No. SP-2, all of the receiving and processing of recyclable materials will be conducted inside Process Building No. 1 or Proposed Process Building No. 2. The facility's primary internal storage area is located within Processing Building No.1. This storage area is used for both recycled products/commodities as well as process out-throws. The facility also has two storage areas located outside for roll-off container storage and trailer storage that are limited to materials to be recycled or empty containers. The Roll-off Storage Area can accommodate 100 roll-off containers of which 10 will contain material to be recycled and the remainder will be empty. Each roll-off container can hold approximately 10 tons of material to be recycled, or 100 tons onsite at a time. The Temporary Trailer Storage Area can accommodate 30 closed trailers that will contain recyclable commodities. Of the 30 trailers, only 15 will contain approximately 150 tons of material collectively, while the remaining trailers will be empty and available for returning to generators to refill at the site of generation.

Finally, a Site Traffic Flow Map ("TF-1") is included in Attachment I that depicts the management of incoming and outgoing shipments at the site. Traffic management at the site is intended to facilitate the efficient movement of recyclable materials and outbound commodities at the facility.

3.1.1 Facility Capacity

The facility has the capacity to accept and process up to seven hundred and fifty (750) tons per day of recyclable materials (including source separated, single stream or C&D materials). Typically, the facility will average approximately five hundred (500) tons per day during routine operations.

Recyclable materials are processed directly following receipt at the facility. Consequently, the facility is not designed to store incoming recyclable materials during normal operating conditions. The facility can store up to a maximum of 5,000 tons of

incoming materials, for up to thirty (30) days in Process Building No. 1's receiving area in the event of an unforeseen shut down. The facility also has the capability to store up to a combined capacity of 5,000 tons of recycled commodities in the designated Storage Areas at the site, (see Drawing No. SP-2, Attachment I). The facility's Product Storage Area inside of Process Building No.1 is also used to store up to 500 tons of process out-throws prior to shipment offsite for disposal or for further processing for recycling or recovery. Process Building No. 2 has a capacity of 100 tons of processed or unprocessed material.

3.2 Facility Access Traffic Management

Access and egress to the site will be provided through the main entrance gate located off of South Heald Street. All vehicles entering and exiting the site will be required to check-in at the facility's main office, and/or the office/scale area trailer and are weighed on one of the facility's two scales. If either of the scales is in-operable for some reason, Gold Medal may accept scale tickets from another appropriately certified scale. The scale tickets for incoming waste will be maintained at the Wilmington facility as part of the operating record and will be made available upon request to any applicable Federal, State or local agency within a two (2) week period from the time of the request.

3.2.1 Operating Hours

The facility may receive recyclable materials 24 hours/day, 7 days/week. The facility operating hours, which include all time periods when materials may be handled or processed at the facility, are 24 hours/day 7 days/week. Although continual operations are not anticipated to be routine, extended hours may be required, as needed, to affect maintenance and repairs at the facility and/or manage periods of peak deliveries.

3.2.2 Site Security

The site is surrounded by 6' high chain link fencing and gates which will be closed during non-operating hours. During normal operating hours a scale attendant will be on duty to limit access to only authorized vehicles and personnel. Additionally, Gold Medal has installed security cameras to monitor security at the facility. This surveillance system will include high resolution video feeds to the office and the ability to digitally record onsite activities.

3.2.3 Area Roadway and Truck Routing

Materials will be delivered to the site using I-495, Route 13 and Route 9 for vehicles serving local areas. These access roadways provide major traffic routes that are designed for heavy vehicle usage and can handle the traffic volume expected to access the facility.

3.2.4 Traffic Volumes and Potential Impacts

The facility is designated to accept a maximum of up to 750 tons/day per the existing permit. However, the average daily volume is expected to be approximately 500 tons/day. Based on a conservative estimate that the average delivery is 8 tons/load, the average number of deliveries received per day will be approximately 63 vehicles or an average of approximately 5 trucks an hour when spread over the facility's normal receiving hours. At the facility's maximum capacity of 750 tons per day, up to 94 trucks will access the site for an operating day or approximately 8 trucks per hour.

Even with the addition of C&D recyclable materials to the approved materials accepted at Gold Medal, the facility has not had any significant traffic impacts to the area.

The facility's traffic volumes add less than a one (1) percent increase to the existing area roadway volumes. This increase is insignificant and has not adversely affected the present levels of service on these roads.

3.2.5 Internal Traffic Management and Procedures

3.2.5.1 Signs and Directional Routing

Appropriate signage is located on the fencing along the access road or posted conspicuously at the site to direct trucks to the appropriate tipping/receiving locations and shipping area for the product commodity pickups. A Site Traffic Flow Plan Map is included in Attachment I which shows the routing of vehicles at the site.

Inbound trucks will be weighed on one (1) of two (2) truck scales, and the scale attendant will provide additional directions on where to deliver incoming loads. After being weighed, trucks will be directed (depending on their contents) to one of the two receiving areas in Process Building No. 1 and/or Proposed Process Building No. 2 to off load the incoming recyclable materials. Trucks will exit the site using the same gate where they entered the facility.

Trucks arriving at the site for outbound shipments will enter the site through the main entrance gate at the site. Vehicles that require an empty weight prior to loading will report to a scale as directed. Vehicles can proceed to one of the designated shipping areas, as indicated on Drawing No. SP-2 as directed by facility personnel. Loaded vehicles will report to a scale, as directed, for a loaded weight prior to exiting the site.

3.2.5.2 Truck Queuing and Staging

Truck queuing is provided for incoming vehicles within the site property and is located adjacent to either scale. Queuing allows trucks waiting to enter the scale to avoid staging or blocking traffic on S. Heald Street. The operations yard at the Gold Medal facility is a large open area that permits efficient vehicle movement

while trucks are onsite. See Drawing TF-1 Site Traffic Flow Map in Attachment I.

3.3 Process Areas and Controls

3.3.1 Process Building No. 1

Process Building No. 1 provides 70,000 square feet of a covered indoor area to receive, process, package and store incoming recyclable materials and outbound commodities. The building has a fully intact metal roof and side walls that surround the unit. There are two overhead metal doors that provide access to the designated receiving areas in the building and one overhead door that provides access to the commodity storage area for shipping the recycled products and out-throws offsite.

The interior of the building has a concrete floor to provide full containment for materials managed on the floor. There are no drains or sumps within the building.

3.3.2 Proposed Process Building No. 2

Proposed Process Building No. 2 will provide 693 square feet of additional processing area that will be used specifically for separating cardboard and plastic materials. Trucks will unload inbound recyclable materials at the middle truck door as shown on Site Drawing No. SP-2. Material will be hand sorted. Trucks will pick up the cardboard or plastic recyclables and transport them to Process Building No. 1 for final packaging.

Proposed Process Building No. 2 is not in use as of this permit renewal application and a starting use date is still to be determined.

3.3.2 Tipping and Receiving Areas

In order to maintain flexibility, the facility will utilize the receiving areas as depicted on the Process and Storage Area Drawing No. SP-2 (Attachment I) depending on the type of material to be recycled. The main receiving area is located on the east side of Process Building No. 1 as shown on Drawing No. SP-2, where incoming recyclable materials are initially deposited. This receiving area is utilized to manage incoming single stream recyclable materials.

C&D materials are currently received at the C&D Process and Product Storage area of Process Building No.1. A proposed C&D covered pad will be used in the future for receiving C&D material.

Gold Medal will keep incoming single stream recyclable materials segregated and separated from C&D recyclable materials using moveable barriers (e.g., jersey barriers). These barriers may be adjusted within the Receiving Area to accommodate changes in volume of incoming material as needed. The C&D Receiving Area is located on the south side of Process Building No.1 as shown on Drawing No. SP-2, in Attachment I and is solely used to tip and unload shipments of C&D recyclable materials.

C&D recyclable materials will be kept segregated from single stream recyclables as the materials are unloaded and generally throughout the process. Gold Medal utilizes different sorting and screening equipment to process these materials, primarily as these materials are generally not amenable to the baling process and are managed on a bulk basis. Occasionally, however incoming shipments of C&D recyclable materials may contain minimal amounts of materials that are amenable to processing along with other single stream recyclable materials. Likewise, at times shipments of single stream materials may contain minimal amounts of materials that are more aptly managed with C&D recyclable materials. In these instances, Gold Medal may pre-sort and segregate materials in the Receiving Area to direct them for appropriate processing.

3.3.3 Material Separation and Sorting Process

The facility has designated areas for material separation and processing to support both the bulk sorting/screening process for C&D recyclable materials as well as the mechanized sorting/baling operation for single-stream recyclables. The C&D Process and Product Storage Area is used primarily for C&D recyclable material processing, and is strategically located on the south side of the Process Building No. 1 (see Drawing No. SP-2, Attachment I). This will allow efficient access to materials staged for bulk processing and sorting/screening. The processing of single-stream recyclable materials is located adjacent to the baler(s) to facilitate segregation of balable materials. Proposed Process Building No. 2 will be used to separate cardboard and plastics when it is brought online. Gold Medal endeavors to utilize state of the art mechanical sorting, segregating and sizing equipment as well as employing some hand sorting measures during material processing. This combination of hand sorting and use of quality equipment with proven separation/sizing capabilities improves the quality of the commodities that are sold to end use markets and maximize the percentage of materials that are recycled.

A primary component of the processing will be the densification of individual recyclable materials via the use of balers.

3.3.4 Product Storage

The facility has (3) product storage areas where the individual recycled products and commodities produced during processing are stored. These storage areas are located inside Process Building No. 1 and are depicted in Drawing No. SP-2 dated September 29, 2016. The proximity of the storage areas to the processing areas and bailing equipment allows Gold Medal to direct the recycled products from processing areas to designated stockpile locations within the process building as needed. Occasionally, Gold Medal may also store products in the facility's designated processing areas where the commodities and recyclable products are produced to maximize productivity.

The combined product storage capacity at the facility, including unprocessed, partially processed, and processed materials will be limited to 5,000 tons of recycled products/commodities. Products or commodities produced from paper, cardboard, plastic, aluminum and bi-metal cans and similar materials will be stored in baled blocks. Bulk product storage includes processed non-balable metals, wood/lumber products, aggregates, non-asbestos containing asphalt shingles and drywall. These bulk materials will be segregated from other recyclable materials and stored separately in concrete bunkers or metal bins/containers (e.g. roll-off containers).

3.3.5 Shipping

Two shipping areas exist; the C&D shipping area on the south side of Process Building No. 1 and the Commodities and Product Shipping Area is located on the north side of the building (see Drawing No. SP-2, Attachment I). Baled recyclables ready to be shipped to market will be loaded via forklift. Other commodities that do not lend themselves to baling will be loaded via rubber-tired loaders.

4.0 MATERIAL MANAGEMENT AND PROCESSING PROCEDURES

A Process Flow Diagram that illustrates the management of materials at the site is provided in Attachment V. This diagram depicts the handling of recyclable materials at the facility from receipt of incoming materials through the offsite shipment of the final products/commodities for resale.

4.1 Material Acceptance Procedures

4.1.1 Acceptable Recyclable Materials

The facility accepts single stream recyclable materials, source separated recycled materials and C&D recyclable materials from various generators as outlined in Section

1.3 above. The recyclable materials that are considered acceptable materials at the facility specifically include paper, cardboard, plastic, metal, drywall, wood products, non-asbestos containing asphalt shingles, and aggregates (e.g., brick, block, stone, concrete, etc.). Any non-recyclable materials or out-throws received with incoming materials will be segregated and managed as described in Section 4.2.3 below. Gold Medal will not accept the following materials at the RRF facility:

- Liquid wastes;
- Infectious wastes (as defined in Section 3.0 of the DRGSW); and/or
- Hazardous waste (as defined in Delaware's Regulations Governing Hazardous Waste).

Any unacceptable wastes that are discovered after arrival at the facility will be rejected as described in Section 4.1.4 below.

4.1.1.1 Procedures for Pre-Qualification and Acceptance of Suspected Asbestos Containing Materials

Gold Medal will employ the following special pre-qualification and acceptance procedures for all suspected asbestos-containing materials ("SACM") and those materials considered asbestos-containing waste materials ("ACWM") as defined under 40 CFR 61 Subpart M.

These materials include, but are not limited to, both asphalt shingles and wallboard/drywall. These procedures are intended to ensure that 1) potential asbestos-containing materials are **not** in advertently mixed or commingled with non-asbestos containing C&D materials; and 2) Gold Medal employees are appropriately protected from potential hazards associated with handling or working with asbestos containing materials.

4.1.1.1.1 Pre-Qualification/Approval Procedures

All suspected asbestos-containing materials, including asphalt shingles and drywall, to be processed at the Gold Medal facility are qualified through a pre-approval review process prior to acceptance at the facility. The source of the SACM includes only post-consumer C&D materials; asbestos-containing materials will not be accepted.

Gold Medal will require customers and contractors to complete a Pre-Approval/Certification Form (see example of the Form in Attachment VII) for each new project. This Form, when completed, will provide Gold Medal with specific information on the SACM and the source that generated it.

Post-consumer asphalt shingles (from roof repairs and replacements, structural demolition projects, etc.) and drywall from C&D projects may include incidental quantities of related roofing/C&D materials, including wood and wood products, roofing paper, nails, flashing and other metal materials. Gold Medal will not accept any asbestos-containing waste materials, fiber glass and other insulation materials, liquid materials (e.g., paints, oils, roofing tars, etc.), floor tiles, or siding. The customer or contractor that intends to bring SACM to the Gold Medal facility must complete the bottom portion of the Pre-Acceptance Application Form, including the applicable certification for each new SACM project. All SACM must also have appropriate documentation from the Generator/Contractor that shows the waste materials are not ACWM by following this procedure:

The generator/contractor will arrange for sampling by a certified asbestos inspector and analysis shall be conducted by a certified laboratory prior to delivery to Gold Medal using the procedures described in the facility's

Sampling and Analysis Information Sheet (“SAIS”) Form, included in Attachment VII. The SAIS Form outlines the sample collection, testing frequency and laboratory requirements to properly complete the sampling. The generator/contractor must include the laboratory results with the Pre-Approval/Certification Form that is submitted to Gold Medal for review. A demolition certification prepared by a licensed Delaware asbestos inspector must also be provided to Gold Medal confirming no shingles/drywall from the project contain asbestos.

If the material is deemed acceptable, and is consistent with the requirements of this Operations Plan, Gold Medal assigns an approval number to the load (e.g., Gold Medal #01032) that is unique to the customer/contractor and project. This number will be used to identify the load if additional materials from the same source or project are received at the facility.

4.1.1.1.2 Acceptance Procedures

Sources of asphalt shingles/drywall, that have been reviewed and approved for the Gold Medal facility using the pre-qualification procedures specified in Section 4.1.1.1.1 above, may be accepted by the facility for storage and processing. Once an approval number is issued for the shingles/drywall, any shingles/drywall from that same project and generator/contractor may be accepted at the facility. For each shipment of shingles/drywall that arrives at the facility, a facility operator will complete the Daily Receipt Log (see Attachment VII) which will include the Gold Medal approval code assigned to the shipment.

4.1.1.1.3 Pre-Acceptance Inspections

Inbound trucks are visually inspected by a facility operator to confirm that the contents are consistent with the pre-approval information and are

acceptable to the facility. Any unacceptable materials identified during this inspection, i.e., ACWM, fiber glass and other insulation materials, liquid materials (e.g., paints, oils, roofing tars, etc.), floor tiles, or siding, may either be properly segregated and rejected back to the generator, or the entire shipment may be rejected as described in 4.1.1.1.4 below.

4.1.1.1.4 Rejection Procedures

If the visual inspection indicates that the vehicle's contents, or a portion of the contents, are not acceptable, the vehicle will be directed to a holding area. Gold Medal will subsequently contact the generator/contractor and describe the reasoning for the rejection of the shipment, or any portion thereof. The vehicle's driver will be directed to return the rejected materials to the generator/contractor for further action. The transporter of the rejected materials must have a Delaware solid waste transporter permit, which approves them to transport the specific rejected waste. Any rejected materials will be noted on the Daily Receipt Log.

4.1.2 Vehicle Receipt/Log-In

Materials are delivered to the site in various types of trucks, including straight trucks and tractor trailers at various times over a 24 hour period. Certain vehicles will be staged in the Temporary Trailer Storage Area prior to acceptance at the site. Trucking of recyclable materials is often a 24 hour a day operation. To accommodate this activity, Gold Medal has designated a section of the yard as trailer storage where trailers can be temporarily staged until the next operating day. Each trailer and delivery vehicle will be weighed at one of the facility's certified scales prior to proceeding to the receiving area for unloading. The scale operator will key the information pertaining to the shipment into the facility's computerized scale system. This information will include the company or customer name and type and amount of material being delivered.

Once the truck is weighed and cleared by the scale operator, the driver will be instructed to proceed to either Process Building No.1 or Proposed Process Building No.2 for unloading. Following delivery of the material to one of the receiving areas, the vehicle will return to the scale where an empty weight will be obtained.

4.1.3 Vehicle Unloading and Inspection Procedure

All vehicles will unload at a designated receiving area at the facility (see Drawing SP-2, Attachment I). These receiving areas are indoors to ensure that all materials delivered to the site are unloaded inside the enclosed process buildings, or covered area.

All incoming materials will be visually inspected for any unacceptable materials by facility operators when the vehicle is unloaded onto the receiving area floor. If any unacceptable material is identified during the inspection, facility personnel will follow the rejection procedures outlined in Section 4.1.4 below. Incoming C&D recyclable material will be kept segregated from incoming single stream recyclable materials in the receiving areas as described in Section 3.3.2 above.

4.1.4 Rejection of Unacceptable Materials

If any unacceptable materials are delivered to the facility, the responsible party and/or generator will be notified and either the material will be placed back on the vehicle or baled/containerized for return to the customer. A warning will be issued by Gold Medal and the customer will be placed on notice that any further violations of the facility's acceptance policy can result in punitive action, including being banned by the facility.

In the event that hazardous waste is discovered, Gold Medal will immediately contact the Solid and Hazardous Waste Management Section (SHWMS) of the Department. The material will be containerized and segregated from the recyclable materials at the site, as soon as is practicable.

Hazardous waste will be removed within 72 hours, unless otherwise authorized by the Department. All removal and disposal shall comply with all applicable sections of Delaware's Regulations Governing Hazardous Waste (DRGHW). A copy of the hazardous waste manifest used to represent the shipment offsite shall be submitted to the Department and a copy shall be maintained by Gold Medal onsite for three (3) years and made available for DNREC review upon request.

4.1.5 Vehicle Staging and Truck Queuing

The truck staging area in the facility yard will provide vehicles adequate space to stage prior to tipping or while waiting to be loaded for shipment offsite. The staging area can accommodate an adequate number of vehicles to allow the facility to weigh trucks in and minimize trucks in the scale queuing area. This will help to eliminate possible queuing of vehicles on South Heald Street.

4.2 Processing

Processing areas are located in Process Building No. 1 and Proposed Process Building No. 2 at the facility and are to facilitate unencumbered operations. Process areas are depicted on Drawing No. SP-2 and described below. The placement of process areas allows for the efficient use of equipment to load the processing/separation units and/or baling system. The Process Flow Diagram, included in Attachment VI, depicts the flow of materials into and through the facility.

4.2.1 Sorting and Separation Practices

The facility will utilize state-of-the-art equipment with demonstrated separation, sorting and sizing capabilities to process incoming recyclable materials. In conjunction with mechanical sorting equipment, the processing will also include hand sorting stations. Hand sorting stations serve to maximize throughput and improve quality of the end product by providing preliminary sizing and removal of unprocessable out-throws. The configuration and order of separation may be adjusted as needed by Gold Medal depending on the final specifications of the end user. This will enhance the flexibility of

the processing system allowing separation and sorting to be modified to meet the demands of a dynamic reuse and recycle commodities market.

4.2.2 Processing Equipment

The facility operates multiple pieces of processing equipment, as required, to meet the demands of the individual end markets and to produce consumable commodities from the materials received. The types of equipment used include, but are not limited to:

- Magnets – Utilized for the removal of steel, bimetallic cans and other ferrous metal materials
- Screens – Utilized to sort and size materials and reduce product contamination
- Air classifiers – can be used to separate materials based on density, including plastics and aluminum
- Eddy Current Sorters – Utilize electrical current to sort aluminum cans
- Optical Sorters – Use variety of light sources to detect and separate certain pre-programmed materials which can greatly improve the quality of the salable commodity
- Sizing Equipment – Gold Medal may utilize grinding/size reduction equipment to meet end market specifications for commodities (e.g., glass, etc.)
- Bailers

4.2.3 Segregation of Out-Throws

As indicated above, the goal of the facility is to continuously improve the quality of the materials to be sold to end markets as well as to reduce land disposal of recyclable materials. As a result, unmarketable materials, known as out-throws, are generated during processing that must be segregated from the marketable recyclables and managed

separately. Out-throws will be generated throughout the sorting process as the recycled products being produced are refined.

4.2.3.1 Storage of Out-Throws

Out-throws will be stored separately from recycled products/commodities and will only be placed in Process Building No.1. Out-throws that are not amenable to baling will be either stored in containers or a separate concrete bunker area inside Process Building No. 1. Unbaled out-throws that contain putrescible materials will only be stored in containers.

4.2.3.2 Disposition and/or Recovery

Out-throws that are generated by the facility will be shipped offsite to an appropriate facility for disposal and/or processing for further recycling or recovery. Although these materials may not be amenable to Gold Medal's resource recovery process, the facility will extend every effort to ensure that materials that may be suitably reclaimed are directed to appropriate facilities for further processing.

4.3 Recyclable Product Management

4.3.1 Product Storage Area

The facility has ample storage space, inside the Process Building No.1 in order to stockpile the various recycled products and commodities produced. The storage areas are depicted on Site Drawing SP-2. The facility can easily store up to 5000 tons of these commodity materials to support plant operation. Materials ready for shipment offsite will be segregated by material type. Most of the materials will be baled while other materials that do not lend themselves to densification will be stored in segregated stock piles or placed in containers or enclosed trailers.

4.3.2 Baling and Packaging

Baling of commodities prior to storage and shipment to market reduces the physical space required for storage and facilitates the loading and shipment of the material. Moreover, certain end markets are only equipped to manage baled materials. Baled products also minimize the potential for materials to be dispersed in the wind or otherwise released to improve overall housekeeping at the site. This form of packaging reduces trapped air in the products to minimize potential degradation of the products that may produce odors. Finally, minimizing trapped air in the baled materials also reduces the risk of fires at the site.

Any material that can effectively be densified by baling will be baled prior to storage and shipment. This includes, but is not limited to paper, aluminum cans, steel or bi-metallic cans and plastics. Occasionally, a small fraction of the recyclable containers received at the facility may still contain residual amounts of product, such as drink containers or aerosol cans, which may be released during baling. Although the amount of material that may be released is typically quickly locked within the bale and is considered incidental to the load, Gold Medal will ensure that good housekeeping practices are observed, the outsides of the bales are wiped down, and any potential leaks or spills are promptly contained and cleaned up during baling operations. Gold Medal will properly dispose of any materials generated in accordance with applicable state requirements.

The location of the baling equipment is shown on Drawing No. SP-2 (Attachment I).

4.3.2.1 Storage Duration

Pursuant to Section 9.4.2.2.4 of the DRGSW, non-putrescible recyclable materials may be stored for up to 30 days, unless otherwise authorized by the Department. Gold Medal has been approved under its existing permit to extend the storage for its final processed commodity to allow the facility up to six (6) months to move these materials offsite. This approval was based on Gold Medal's demonstrated

need for this additional time, consistent with Section 9.4.2.2.4.1 of the DRGSW, due to the dynamics of the end reuse or recycle markets and unpredictable accumulation rates. For example, in certain instances, separated materials may not accumulate quickly enough to generate a truckload of material in 30 days. Consequently, additional time is required to accumulate sufficient quantities to allow the facility the opportunity to utilize efficiencies in bulk transportation rates.

Additionally, the recycled products/commodities produced by Gold Medal are subject to market demand that may fluctuate with end market reuse facilities. The fluctuation may change based on seasonal conditions, economic factors (e.g., fuel costs, etc.) or other changes in market needs. The extended storage time allows Gold Medal to postpone deliveries of certain commodities to optimize material movement and appropriately respond to fluctuations in market demands.

Gold Medals' designated storage areas give the facility the ability to store up to a combined 5,000 tons of processed commodities. Gold Medal anticipates that while select recycled commodities may require extended storage times, the majority of the product inventory will be turned over more frequently. Consequently, Gold Medal believes that, consistent with Section 9.4.2.2.4.2 of the DRGSW, there is sufficient storage space at the facility to accommodate the approved extended storage times.

In accordance with Section 9.4.2.2.4.4 of the DRGSW, Gold Medal has implemented an inventory methodology that will be utilized to ensure recyclables do not remain onsite for more than 6 months. The inventory methodology at the site is a rotational method where the first materials in are the first materials shipped out. This is further described in Section 4.3.2.2 below. Also, Gold Medal will tag all bales with the production date and commodity type to provide verification that bales are not in storage more than 6 months.

4.3.2.2 Inventory Control

Gold Medal utilizes an electronic scale software system to monitor and determine material inventory by type and quantity. The scale system records all incoming materials and outbound shipments to maintain a suitable accounting of onsite inventory. Processed materials are managed on a first-in/first-out principle to ensure that inventory turnover does not exceed the storage limits specified in Section 4.3.2.1 above. Gold Medal will maintain both a physical and electronic record of the facility's inventory at its corporate headquarters as provided in Section 8.0 below.

Baled commodities are stored in inventoried rows as it is generated. When a row is complete, a new row is started. When commodities are shipped offsite, Gold Medal will begin shipping the first row completed. This will allow the facility to physically determine when the inventory is turned over.

For the materials stored in bulk, Gold Medal will ensure that the concrete bunker areas utilized to store aggregates, wood, etc., as well as the metal bins/containers used to store bulk metals or wood, are emptied at least once every 6 months to ensure these commodities are not stored beyond the limit specified in Section 4.3.2.1 above.

4.3.3 Bulk Storage of Certain Products

As referenced above, storage or transport of certain commodities is not improved by baling. These items will be stockpiled in segregated areas based on end market demands. These items include, but are not limited to bulk metals, wood materials, non-asbestos containing asphalt shingles, aggregates, and drywall.

4.3.4 Out-Throw Storage and Management

As described in Section 4.2.3.1 above, the facility may generate out-throws that are not amenable to baling. In these instances, out-throws will be stored separately in a concrete bunker or in containers inside the Process Building No. 1. Out-throws that contain putrescible materials will be containerized. Pursuant to Section 9.4.2.8.1 of the DRGSW, processed out-throw residuals may only be stored onsite for up to 3 days, without prior Department approval. Under its existing permit, Gold Medal has been approved to store baled out-throws onsite for up to 30 days prior to shipment offsite for disposal provided the volume of out throws at the facility never exceeds 500 tons (if putrescible, the 3 day limit remains in place). Again, the accumulation rate of out-throws will vary and the additional time will permit the facility to ensure that truck load quantities are accumulated prior to shipment and the tonnage limit will assure removal of out-throws so as not to impede facility operations.

4.3.5 Shipping

Commodities will be shipped offsite in the most efficient and effective manner. This will include enclosed trailers, box vans, overseas shipping containers, or flatbed trailers for baled materials. Materials such as asphalt shingles that will not be baled, will be shipped by tri-axle dump trucks or trailers. The method of shipment will be adjusted based on the demands of the end market users and transportation efficiencies.

4.4 Additional Management Conditions/Procedures

4.4.1 Unanticipated Facility Outages

Section 7.0 below discusses the site Contingency Plan to address responses and methods to prevent facility-wide emergencies. However, in the unlikely event of a catastrophic situation that causes an unanticipated facility outage, Gold Medal will extend every effort to minimize the downtime. If the plant is out of service and unable to process recyclable

materials for an extended period, Gold Medal intends to continue to accept single stream, source separated and/or source separated C&D recyclable materials and direct ship them to other regional recycling facilities. This measure will enable Gold Medal to establish itself as a highly reliable market for single stream and source separated recyclable materials.

4.4.2 Equipment Failure/Breakdown

Gold Medal will implement a quality control and preventative maintenance program which will include inspections and routine maintenance as outlined in Section 5.0 below. The preventative maintenance program will include regular service and pre-scheduled equipment maintenance in accordance with the manufacturer's guidelines. These measures will be undertaken by site personnel to avoid unscheduled equipment downtime. However, not all equipment breakdowns can be avoided. In the event of equipment failure, the facility maintenance team will complete repairs as quickly as possible. When conditions merit, outside vendors will be utilized to make prompt repairs and minimize downtime.

5.0 FACILITY INSPECTION AND MAINTENANCE PROCEDURES

5.1 Routine Inspections of Storage and Process Areas

5.1.1 Daily Inspections

Gold Medal's Facility Manager, or his designee, will inspect the facility grounds, Process Building No. 1, Proposed Process Building No. 2, and other operating areas on a daily basis. This inspection will include a visual check of all related vehicles, equipment, site operations as well as an evaluation of site conditions outlined in Section 2.6 above. The daily inspections will be documented using the Daily Facility Inspection Report included as Attachment VI. During this daily inspection, Gold Medal will note on the Inspection Report any areas that are not acceptable and document any corrective actions taken to

address concerns at the site. It is also the responsibility of the Facility Manager to evaluate each situation as it arises during the operation of the RRF facility. Accordingly, at the Facility Manager's discretion, he/she may determine that a situation is serious and requires the immediate shut down of these operations. In the case of a serious situation, the Facility Manager will contact other company managers at Gold Medal to assist with the assessment and determination of the nature of the incident at hand and recommend effective management techniques in order to rectify the situation.

On a daily basis, the Facility Manager will also conduct and document a visual inspection of the receiving, processing and storage areas of the facility as well as the perimeter of the property for any evidence of unintentional releases.

5.1.2 Unsatisfactory Conditions

Any unsatisfactory conditions found during daily inspections such as odors, dust or litter will be reported to the appropriate member of the facility's management team. If conditions pose an immediate threat to human health or the environment, or could result in significant damage to the facility or operating equipment, the Facility Manager will take immediate corrective actions to address the condition(s).

5.2 Routine Maintenance of Processing Equipment

Gold Medal will implement a preventative maintenance program. This program will include routine inspections of equipment including all sorting, separation and sizing equipment, conveyors, other processing equipment and all mobile equipment. The inspections will follow manufacturer's recommended guidelines and will be performed by a qualified technician.

The inspections along with routine preventative maintenance will be implemented in an effort to avoid unscheduled equipment outages and breakdowns.

6.0 HEALTH AND SAFETY EMPLOYEE TRAINING

All facility employees will work under appropriate health and safety guidelines established by the Occupational Safety and Health Administration (OSHA). Use of personal protective equipment will be in accordance with 29 CFR 1910.132, as a minimum. First aid equipment will be maintained and available in the facility office. Emergency telephone numbers of nearby ambulance, hospital, police, and fire services will be prominently displayed at appropriate areas onsite and can also be found in the facility Contingency Plan and Emergency Response Plan (see Attachment III).

All employees who are required to utilize equipment for the proper operation of the facility will be appropriately trained in the operation and maintenance of the equipment prior to use. Gold Medal will maintain documentation of any required training provided at the facility. Training will include, at a minimum, the following documentation of employee information:

- The name of the employee receiving training;
- The name of the trainer or qualified instructor;
- A brief description of training provided;
- The date the training was completed; and
- A signature of the employee documenting attendance.

In addition to the equipment training, the training program is also designed to ensure that certain facility personnel are properly trained with the knowledge to effectively respond to emergency situations. These employees are shown the location of emergency equipment, such as fire extinguishers, absorbent materials, and first aid supplies, and are given appropriate instruction on the equipment use. Employees are also informed of the recognition of and proper handling procedures for waste materials that may have potentially harmful effects.

All new employees receive training within 90 days of the start of employment that consists of a plant tour of process operations, followed by hands on training period in the area where the employee will work. Refresher training will be provided to employees annually, or as otherwise

specified by OSHA. All employee training will be provided by the Facility Manager, or his designee.

7.0 CONTINGENCY PLAN AND EMERGENCY RESPONSE PROCEDURES

The facility Contingency Plan and Emergency Response Plan can be found in Attachment III. This plan outlines the appropriate responses to emergencies including fires, spills or explosions.

8.0 RECORDKEEPING PROCEDURES

8.1 Shipping Documents

Each incoming vehicle that arrives at the facility will be weighed in and the following information will be collected and recorded:

- Weight of the material received;
- Name, address, and phone number of transporter;
- Transporter's solid waste transporter number;
- Name, address and phone number of the customer; and
- Type of recyclable material delivered.

Records for rejected loads including the reason for rejection, will be maintained at the Wilmington facility.

Records of shipments of commodities to offsite end markets will be recorded and maintained electronically and can be provided on the same day as requested. The records will include:

- Weight of material shipped;
- Type of material; and
- Name and address of the end market recycling or reuse facility.

Records of shipments of out-throws that are sent offsite for disposal will be recorded and maintained onsite. These records will include:

- Weight of out-throws shipped;
- Name and address of the receiving or disposal facility where the out-throws were sent; and
- The transporter and solid waste transporter number.

As outlined in Section 1.5 above, Gold Medal calculates the percentage of out-throws generated by the facility as a portion of the incoming recyclable materials received on at least a monthly basis.

8.2 Operating Records

Although the electronic recordkeeping system employed by Gold Medal at the corporate headquarters maintains an electronic file of all scale transactions, hard copies of records are only available on a bi-monthly basis. The facility will maintain, and make available all records outlined in this Operating Plan for DNREC's review upon request, and as addressed in Section 9.4.3 of the DRGSW. These will include:

- Records documenting the information on inbound and outbound shipments as defined in Section 8.1 above;
- Equipment inspection and maintenance records;
- Records of the weight and percentage of out-throws generated by facility operations as described in Section 8.1 above;
- Records of any fires, spills, incidents or events where the Contingency Plan and Emergency Response Plan was implemented;
- Training records;
- Records of any fire or safety inspections; and

- Daily inspections.

8.3 Incident Reports

Reports of any significant operating issues or emergencies will be maintained onsite. This includes fires, spills, and releases that occur at the facility or any loads received at the facility.

8.4 Periodic Reports

8.4.1 Annual Facility Report

The facility shall submit to the Department an annual report summarizing facility operations for the preceding calendar year in accordance with Section 9.4.4 of the DRGSW. The report will summarize all processing, monitoring and construction activities conducted in the previous calendar year. The report will include the following information:

- Types and weight or volume of materials received at the site;
- Types and weight or volume of recycled commodities sent offsite and the identification of the end market user;
- Weight or volume of out-throws sent offsite and the location and ultimate disposal of the material;
- A complete list of the commercial haulers that delivered materials to the site during the calendar year;
- A discussion of the feasibility of recycling materials that are currently being received by the facility but are not being recycled;
- A description of any unintentional or accidental deviation from the approved Operations Plan; and

- A description of any construction or corrective work conducted at the site that was completed in accordance with an approved plan or to comply with a requirement under the DRGSW.

8.4.2 Annual Recycling Report

In accordance with the Universal Recycling Law, the facility will submit an annual report to the Department no later than February 15th of each year. The report will include all recycling activities pursuant to the reporting guidelines established by the Department and the Recycling Public Advisory Council.

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Plan Revised 3-2017.docx*

Attachment I

Maps and Drawings

Gold Medal Environmental of DE, LLC

Operations Plan

Attachment I

Maps and Drawings

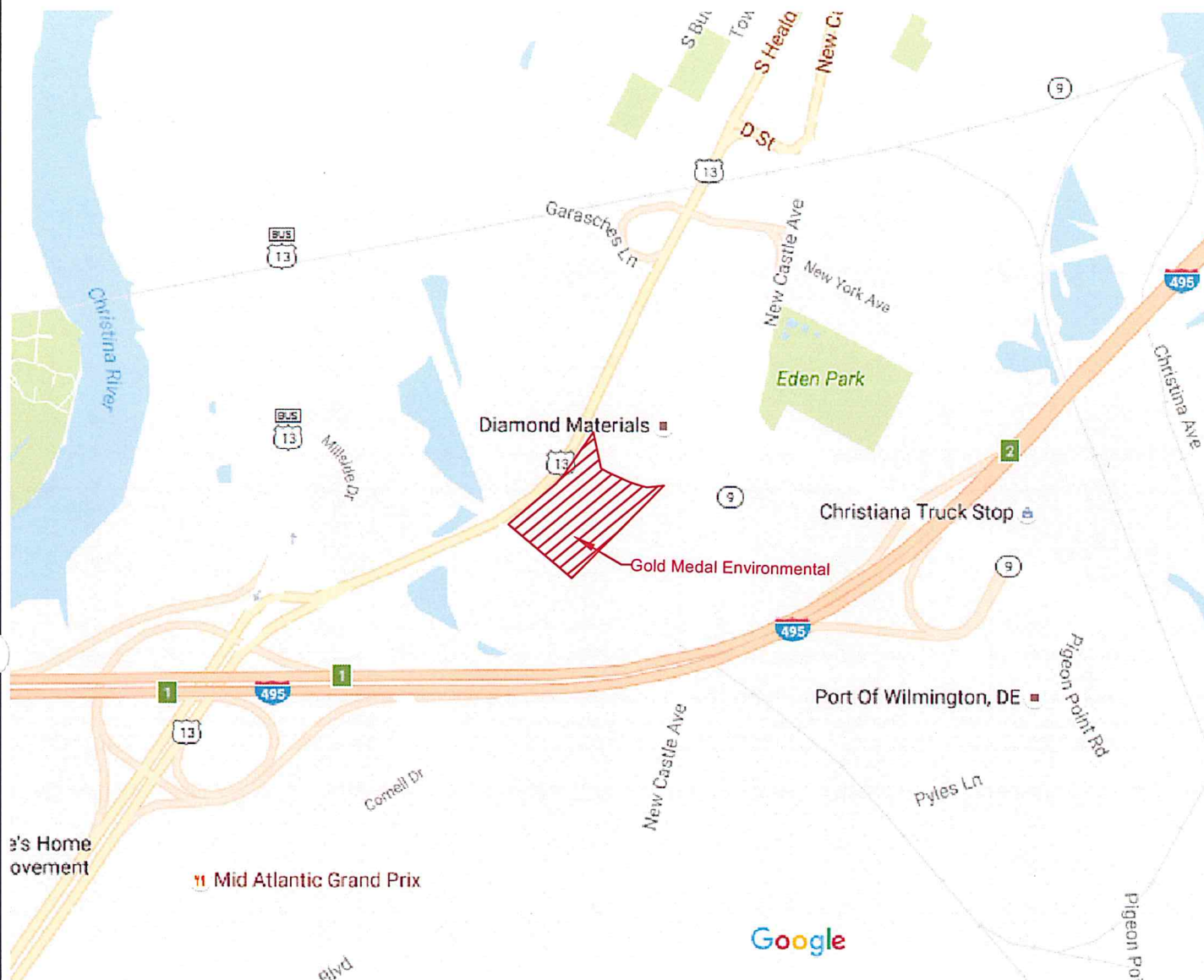
Facility Drawing List:

1. **Site Location Map**
2. **Aerial Photograph**
3. **U.S.G.S. Topographic Map**
 - **CPS Drawing T-02, Topographic Features Map,**
dated November 21, 2016
4. **Flood Insurance Rate Map** — New Castle County, DE;
Origin Date: April 17, 1996; Revised: February 4, 2015
5. **CPS Drawing No. SP-1**
(Site Plan dated September 28, 2016)
6. **CPS Drawing No. SP-2**
(Process and Storage Area Location, Rev. 1, dated January 9,
2017)
7. **Site Traffic Flow Plan Map**

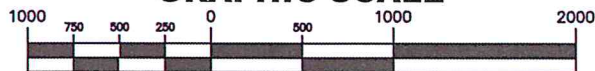
Site Location Map

SITE LOCATION MAP

GOLD MEDAL ENVIRONMENTAL OF DE, LLC
1000 S. HEALD STREET
WILMINGTON, DE 19801



GRAPHIC SCALE



(IN FEET)
 1 inch = 1000 ft.

Source: GOOGLE EARTH	Scale: 1"=1000'	Approved By: Bradley J. Cunningham, P.E.	Date: 09/28/16
	Project No: 0338.02	Drawn By: Benjamin McGovern	



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 P.O. Box 186
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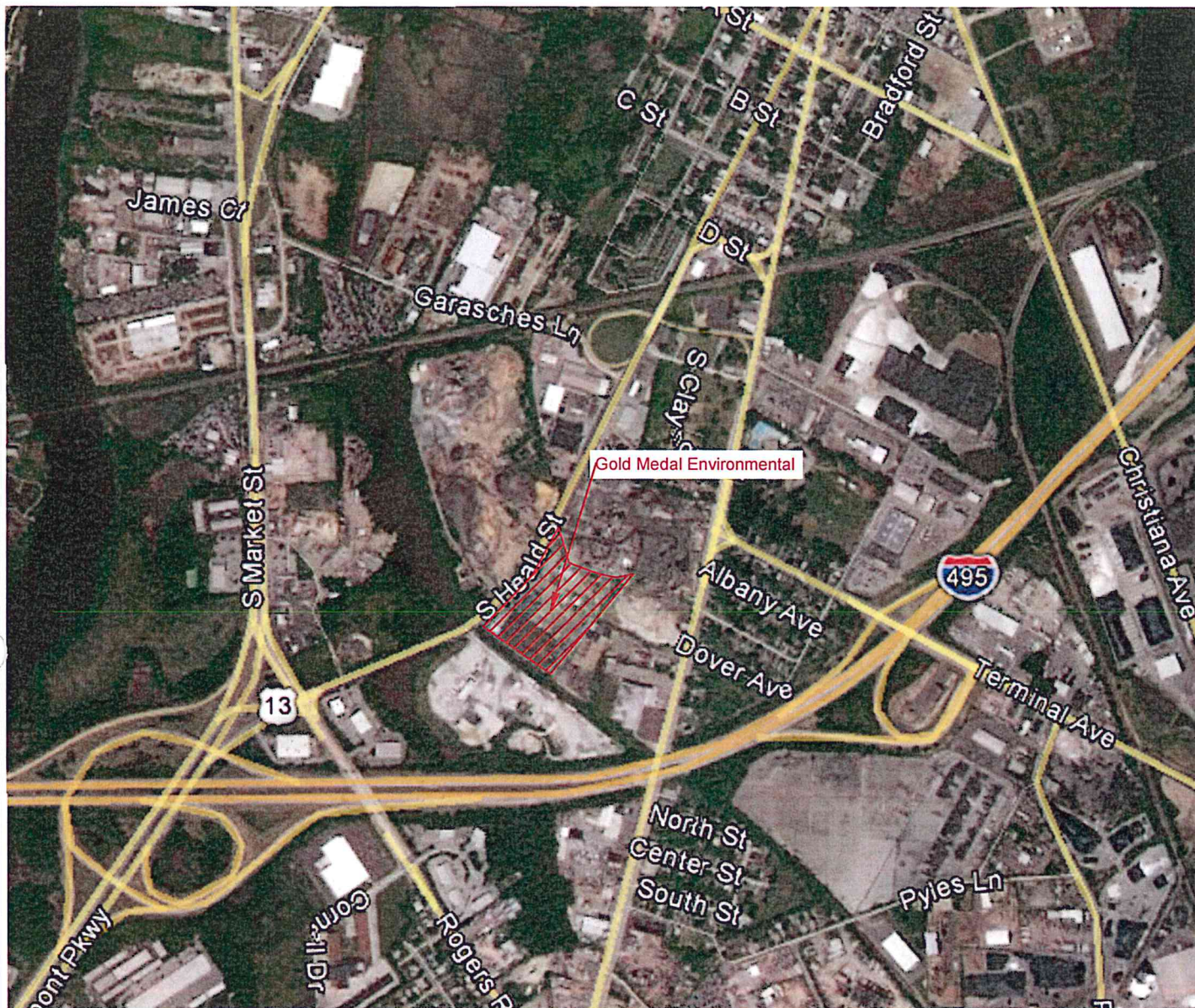
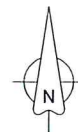
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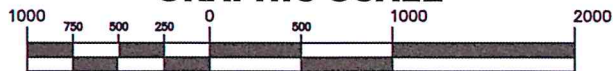
Aerial Photograph

AERIAL SITE LOCATION MAP

GOLD MEDAL ENVIRONMENTAL OF DE, LLC
1000 S. HEALD STREET
WILMINGTON, DE 19801



GRAPHIC SCALE



(IN FEET)
1 inch = 1000 ft.

Source:

GOOGLE EARTH

Scale:

1"=1000'

Approved By:

Bradley J. Cunningham, P.E.

Date:

09/28/16

Project No:

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PHONE: (215) 734-1414 * FAX: (215) 734-1424

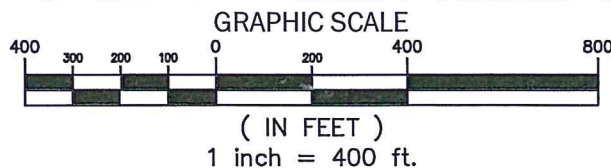
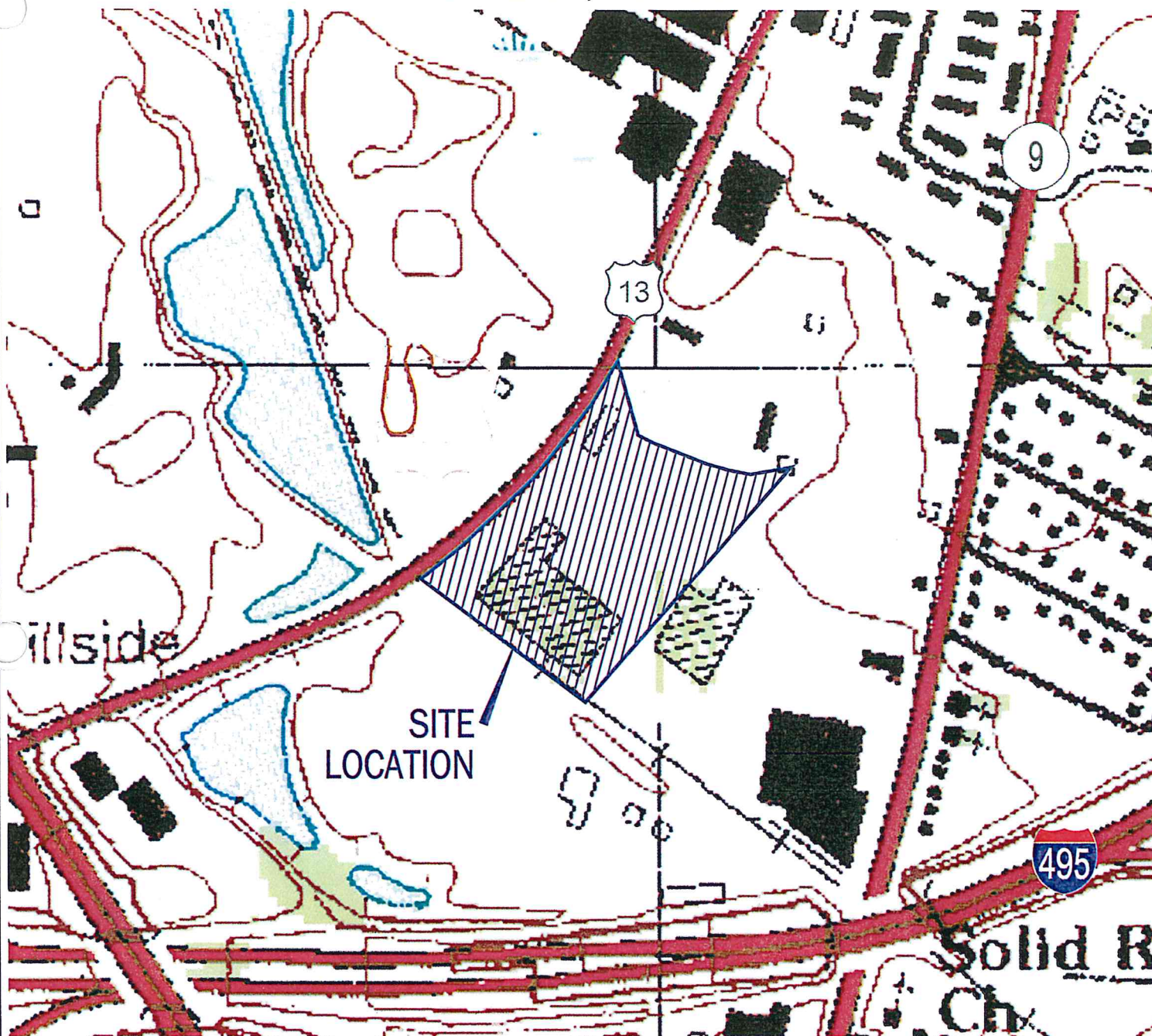
www.CPS-2Comply.com

Drawing No.:

AERIAL-01

Topographic Map

TOPOGRAPHIC MAP
GOLD MEDAL ENVIRONMENTAL OF DE, LLC
1000 S. HEALD STREET
WILMINGTON, DE 19801



Source:	Scale: 1 inch = 400 feet	Approved By: Bradley J. Cunningham, P.E.	Date: 09/28/16
	Project No: 0338.02	Drawn By: Benjamin McGovern	

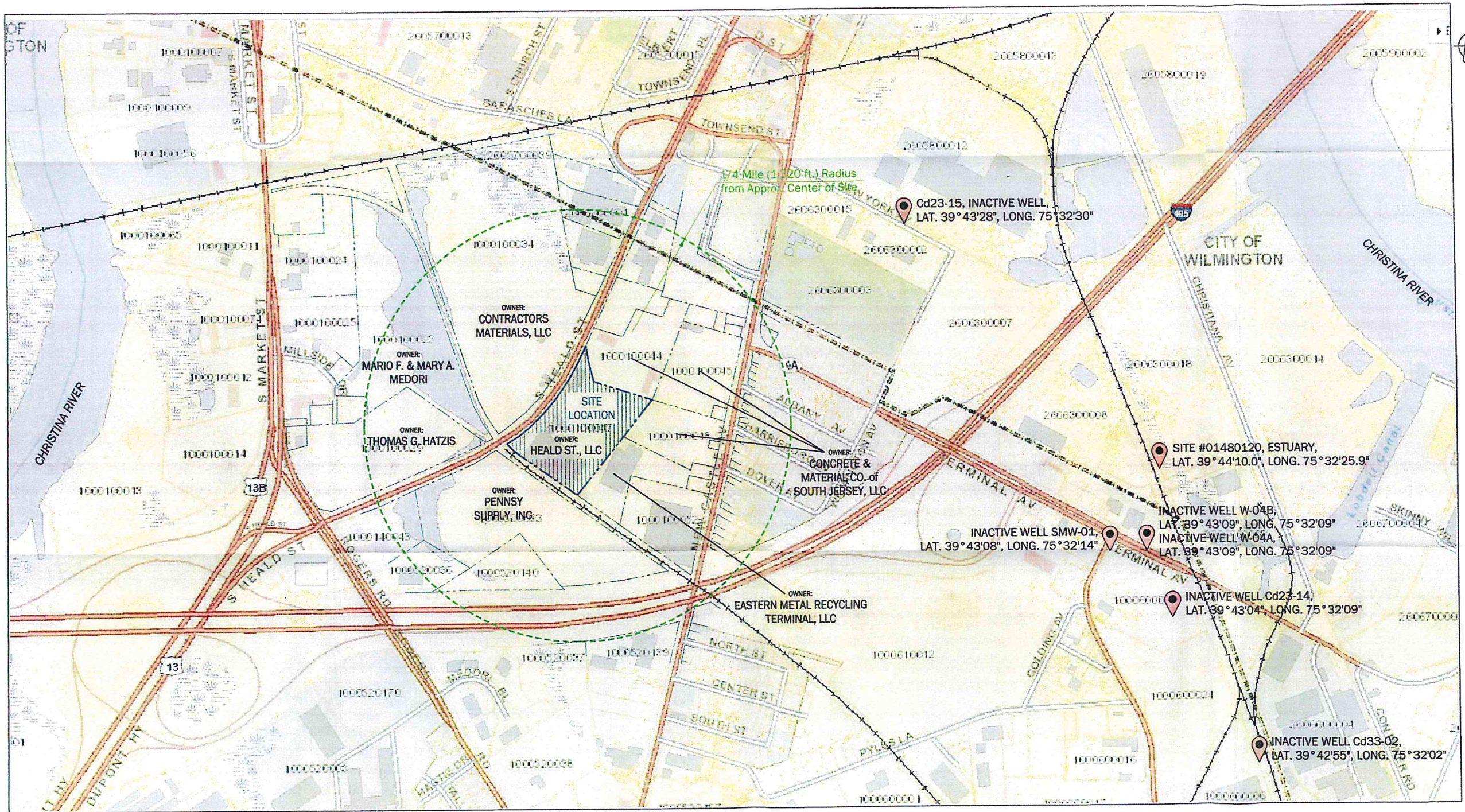


COMPLIANCE PLUS SERVICES, INC.
P.O. BOX 186
HATBORD, PA 19040
PHONE: (215) 734-1414 * FAX: (215) 734-1424

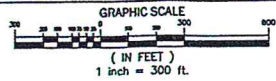
www.CPS-2Comply.com

Drawing No.:

TOPO-01



TOPOGRAPHIC FEATURES MAP



NOTES:

1. THE BACKGROUND IMAGE, ADJACENT PROPERTY OWNERS AND PROPERTY LINES WERE OBTAINED ONLINE USING THE NEW CASTLE COUNTY, DELAWARE, GEOGRAPHIC INFORMATION SYSTEMS MAP VIEWER.
 2. INDICATES LOCATION OF SURFACE WATER INTAKE.
 - INDICATES LOCATION OF INACTIVE WATER WELL.
- INFORMATION REGARDING THE LOCATION OF ACTIVE AND INACTIVE WATER WELLS AND SURFACE WATER INTAKES WAS OBTAINED ONLINE FROM THE U.S.G.S. NATIONAL WATER INFORMATION SYSTEM: MAPPER. THERE WERE NO ACTIVE WATER WELLS DETERMINED TO BE IN THE VICINITY OF THE PROJECT SITE.

TOPOGRAPHIC FEATURES MAP Gold Medal Environmental of DE, LLC 1000 South Heald Street Wilmington, Delaware 19801		COMPLYANCE PLUS SERVICES, INC. 455 BUSINESS CENTER DRIVE SUITE 250 HATBORO, PA 19040 PHONE (215) 734-1414 * FAX (215) 734-1424 www.CPS-2Comply.com		Project No. 0338-02 Scale 1 inch = 300 feet Approved By Bradley J. Cunningham, P.E. Drawn By Rick Grodwell		Sect. Bradley J. Cunningham, P.E. DC License No. 17746	
Dwg. No.	T-02	Date:	11/21/2016				

FIRM (Flood Insurance Rate Map)

New Castle County

Origin Date: April 17, 1996

Revised: February 4, 2015

#0338 - Gold Medal Resource Recovery Permit Renewal 1000 S Heald St 2016 Drawings\FE-01 Blue River FIRM Map.dwg



LEGEND

SPECIAL FLOOD HAZARD AREAS (SFHAs) SUBJECT TO INUNDATION BY THE 1% ANNUAL CHANCE FLOOD

The 1% annual chance flood (100-year flood), also known as the base flood, is the flood that has a 1% chance of being equaled or exceeded in any given year. The Special Flood Hazard Area is the area subject to flooding by the 1% annual chance flood. Areas of Special Flood Hazard include Zones A, AE, AH, AO, AR, A99, V, and VE. The Base Flood Elevation is the water-surface elevation of the 1% annual chance flood.

ZONE A No Base Flood Elevations determined.

ZONE AE Base Flood Elevations determined.

ZONE AH Flood depths of 1 to 3 feet (usually areas of ponding); Base Flood Elevations determined.

ZONE AO Flood depths of 1 to 3 feet (usually short flow on sloping terrain); average depths determined. For areas of alluvial fan flooding, velocities also determined.

ZONE AR Special Flood Hazard Area formerly protected from the 1% annual chance flood by a flood control system that was subsequently destroyed. Zone AR indicates that the former flood control system is being restored to provide protection from the 1% annual chance or greater flood.

ZONE A99 Area to be protected from 1% annual chance flood by a Federal flood protection system under construction; no Base Flood Elevations determined.

ZONE V Coastal flood zone with velocity hazard (wave action); no Base Flood Elevations determined.

ZONE VE Coastal flood zone with velocity hazard (wave action); Base Flood Elevations determined.

FLOODWAY AREAS IN ZONE AE

The floodway is the channel of a stream plus any adjacent floodplain areas that must be kept free of encroachment so that the 1% annual chance flood can be carried without substantial increases in flood heights.

OTHER FLOOD AREAS

ZONE X Areas of 0.2% annual chance flood; areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 1% annual chance flood.

OTHER AREAS

ZONE X Areas determined to be outside the 0.2% annual chance floodplain.

ZONE D Areas in which flood hazards are undetermined, but possible.

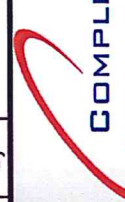
COASTAL BARRIER RESOURCES SYSTEM (CBRS) AREAS

OTHERWISE PROTECTED AREAS (OPAs)

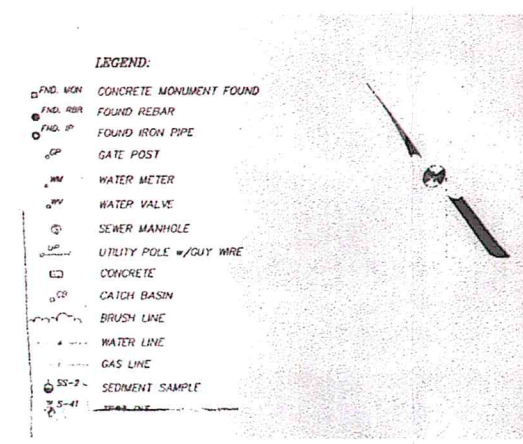
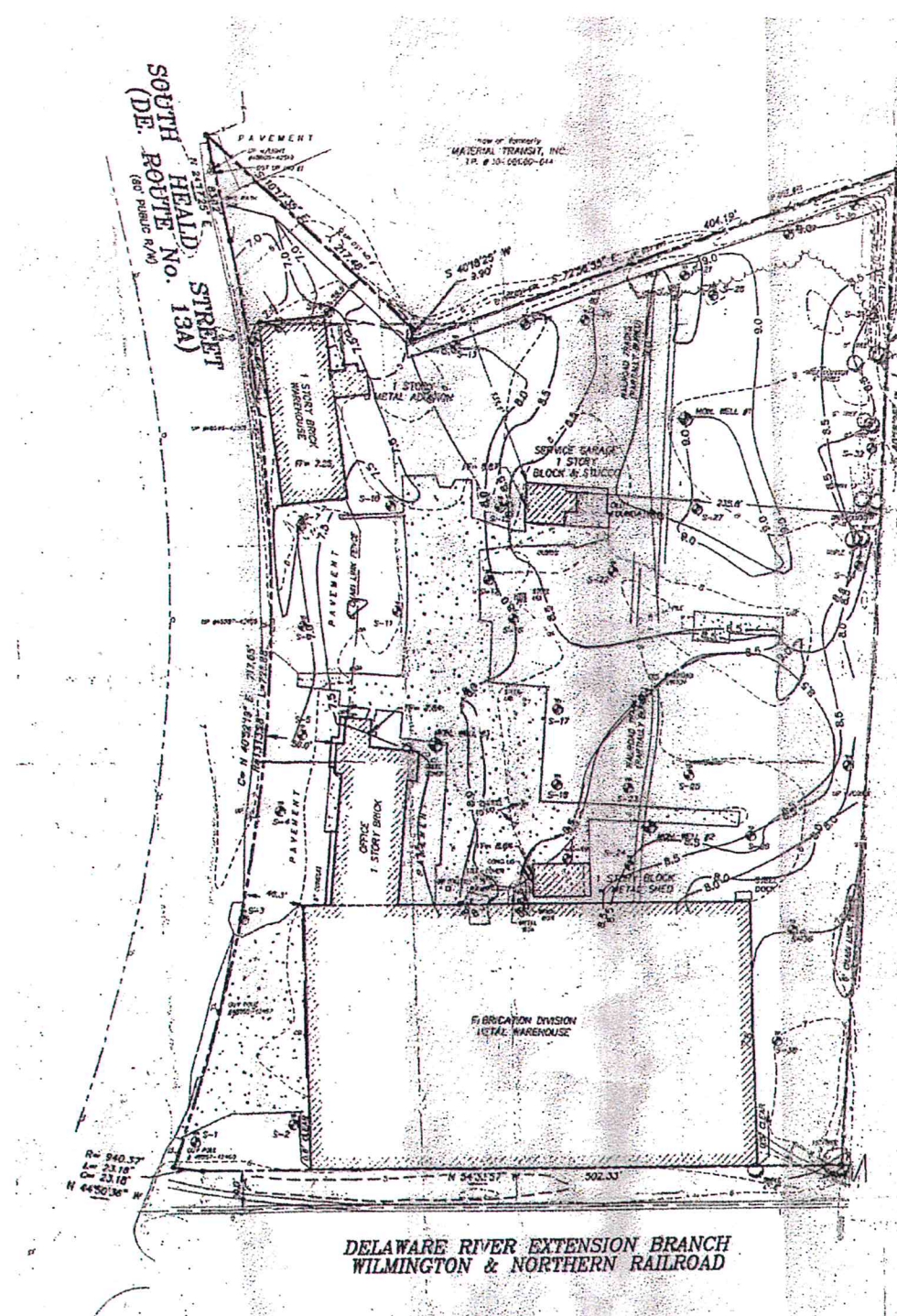
CBRS areas and OPAs are normally located within or adjacent to Special Flood Hazard Areas.

Floodplain boundary
Zone D boundary
CBRS and OPA boundary
Boundary dividing Special Flood Hazard Area Zones and boundary dividing Special Flood Hazard Areas of different Base Flood Elevations, flood depths or flood velocities.
Limit of Moderate Wave Action
Base Flood Elevation line and value; elevation in feet*
Base Flood Elevation value where uniform within zone; elevation in feet*
* Referenced to the North American Vertical Datum of 1988
Cross section line
Traverse line
Geographic coordinates referenced to the North American Datum of 1983 (NAD 83), Western Hemisphere
1000-meter Universal Transverse Mercator grid values, zone 18N
5000-foot grid values; Delaware State Plane coordinate system (FIPS ZONE 0700), Transverse Mercator projection
Bench mark (see explanation in Notes to Users section of this FIRM panel)
River Mile
MAP REPOSITORY
Refer to listing of Map Repositories on Map Index
EFFECTIVE DATE OF COUNTYWIDE FLOOD INSURANCE RATE MAP
April 17, 1995
EFFECTIVE DATE(S) OF REVISION(S) TO THIS PANEL
See Notice to Users page in FIS Report.

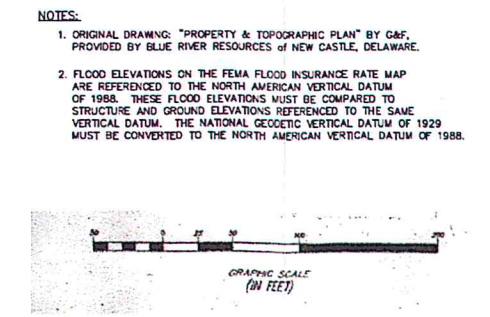
Background map images obtained from FEMA Flood Insurance Rate Maps (FIRM) 10003C0156K & 10003C0158K, revised February 4, 2015.
Aerial images obtained from Google earth, dated 5/24/2016.

Drawing: FE-01		Date: 09/28/2016	
FLOOD ELEVATION MAP Resource Recovery Facility Gold Medal Environmental of DE, LLC 1000 S Heald Street Wilmington, Delaware 19801			
COMPLIANCE PLUS SERVICES, INC. 455 BUSINESS CENTER DRIVE SUITE 250 HATBORO, PA 19040 PHONE (215) 734-1414 * FAX (215) 734-1424 www.CPS-2Comply.com			
			
Project No. 0338			
Scale 1 inch = 500 feet			
Approved by: Bradley J. Cunningham, P.E.			
Drawn by: Rick Cordwell			
Rev. No.	Date	By	Description

CPS Drawing No. SP-1
Site Plan



- NOTES:**
- OWNER:
 - TAX PARCEL No's: 10-001.00-047 & 10-001.00-048
 - SOURCE OF TITLE: DR. 366-277, DR. R-68-347 & DR. K-76-250
 - AREA = 12.046 ± ACRES
 - ZONING: BURGUNDY SETBACKS: 10' FRONT, 20' REAR
 - DATE OF FIELD SURVEY: APRIL 18, 1995
 - AS SCALED FROM THE NATIONAL FLOOD INSURANCE PROGRAM RATE MAP COMMUNITY PANEL NUMBER 105085 00350, REVISED SEPTEMBER 4, 1986, THIS PROPERTY LIES WITHIN ZONES 'A-5' & 'D'.
 - HORIZONTAL DATUM: NORTH AMERICAN DATUM, 1927.
 - VERTICAL DATUM: NATIONAL GEODETIC VERTICAL DATUM, 1929.
 - BENCHMARK: "MILLSIDE" - IN TRIANGULAR ISLAND AT INTERSECTION OF U.S. ROUTE 13, U.S. ROUTE 13-A AND ROGERS ROAD. ELEV = 24.957 (NGVD 1929)
 - SITE BENCHMARK: FOUND MONUMENT AT PROPERTY CORNER ON SOUTHERLY SIDE OF SHIPPING & HANDLING BUILDING. ELEV = 6.40 (NGVD 1929)



OWNER OF RECORD:
HEALD STREET, LLC
4048 NEW CASTLE AVENUE
NEW CASTLE, DE 19720

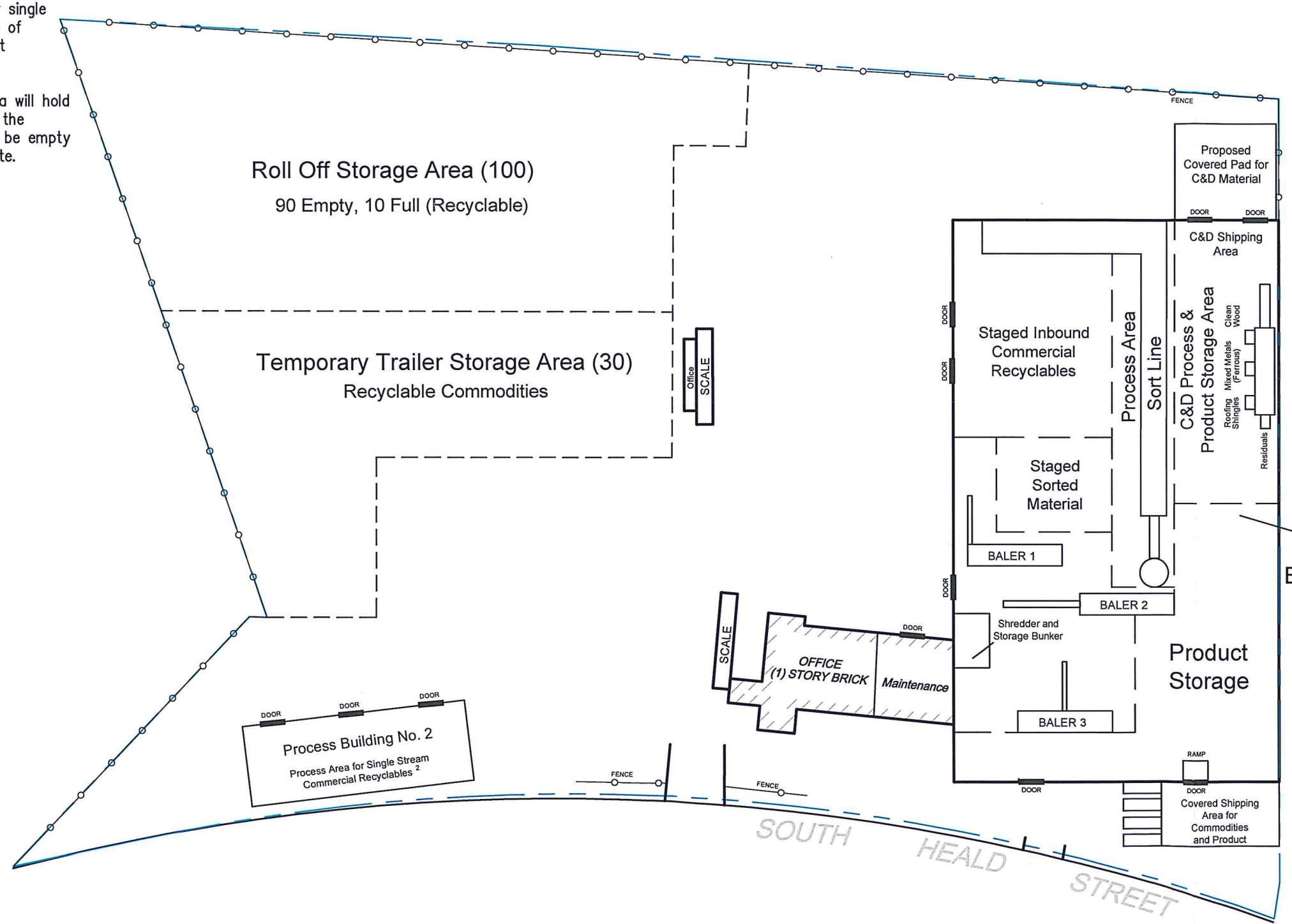
Project No. 0338.02	Scale As Noted	Approved By Brodley J. Cunningham, P.E.	Drawn By Thomas Cunningham
COMPLIANCE PLUS SERVICES, INC.			
Resource Recovery Facility - Site Plan			
Gold Medal Environmental of DE, LLC			
1000 S. Heald Street			
Wilmington, Delaware 19801			
Drawing No. SP-1	Revision No. 0	Date 09/28/2016	

CPS Drawing No. SP-2
Process and Storage Area Location

N:\0338 - Gold Medal\Resource Recovery Permit Renewal 1000 S Heald St 2016\Drawings\CPS Drawings\Blue River Plans_2.dwg

NOTES:

- 1. Material separated in Process Building No. 2 will be sent to Process Building No. 1 for additional processing prior to shipment offsite as a commodity.
- 2. This process area is proposed for single stream commercial recyclables as of September 2016. The area is not currently in use.
- 3. The temporary trailer storage area will hold 30 trailers. Approximately 15 of the trailers will be loaded and 15 will be empty and awaiting removal from the site.



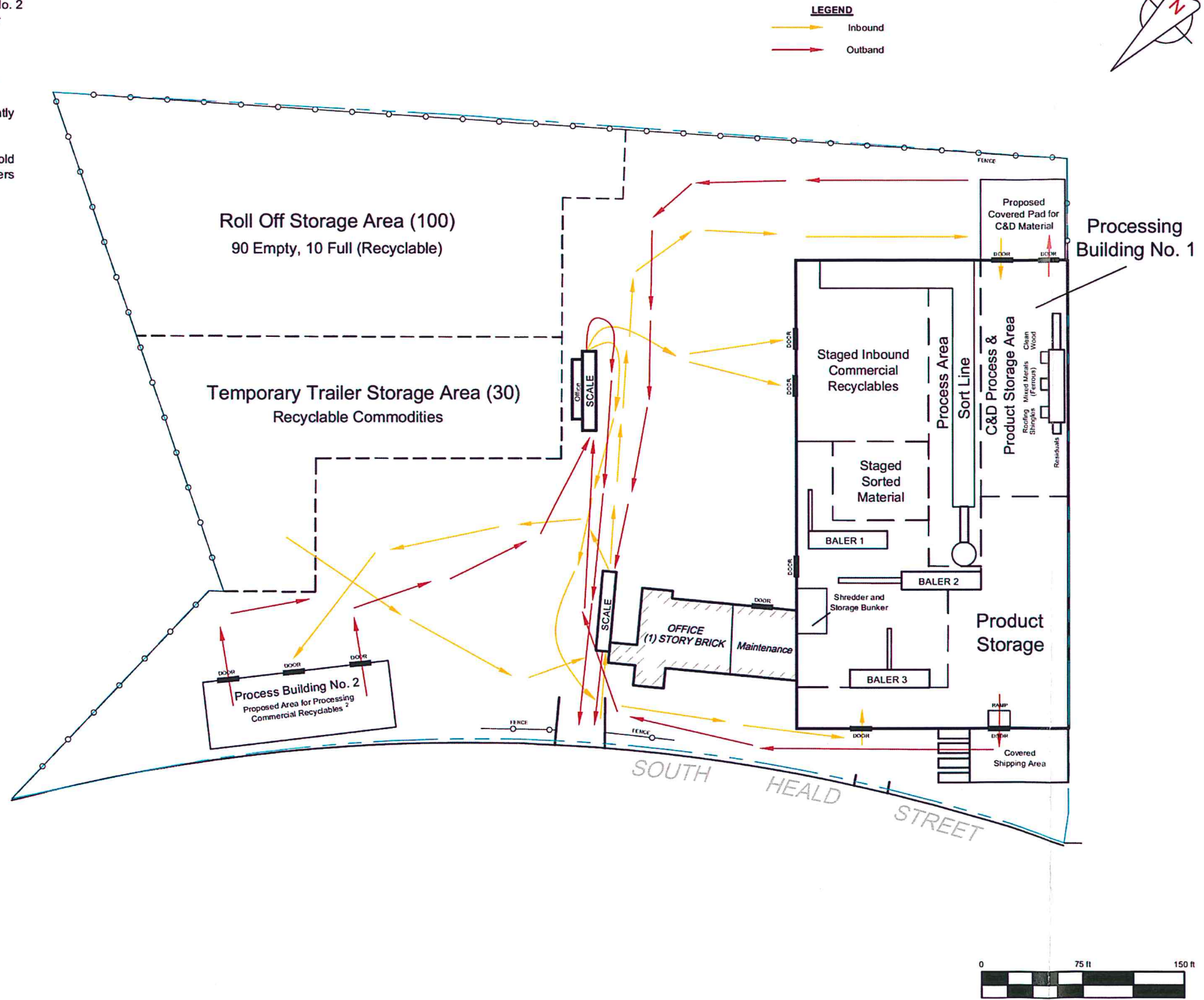
Revised Per DNR Comments		Description	
1	01/09/2017	RAG	By
Rev. No.		Date	By
COMPLIANCE PLUS SERVICES, INC.			
COMPLIANCE PLUS SERVICES, INC.			
Project No. 0338.02			
Scale: 1" = 75'			
Approved By: Bradley J. Cunningham, P.E.			
Drawn By: Thomas Cunningham			
Resource Recovery Facility - Process & Storage Area Location		COMPLIANCE PLUS SERVICES, INC.	
Gold Medal Environmental of DE, LLC		455 BUSINESS CENTER DRIVE	
1000 S. Heald Street		SUITE 250	
Wilmington, Delaware 19801		HATBORO, PA 19040	
Drawing: SP-2		PHONE (215) 734-1414 * FAX (215) 734-1424	
Date: 09/28/2016		www.CPS-2Comply.com	

Site Traffic Flow Plan Map

N:\40338 - Gold Medal Resource Recovery Permit Renewal 1000 S Heald St 2016\Drawings\CPS Drawings\Gold Medal Traffic Plan.dwg

NOTES:

1. Material separated in Process Building No. 2 will be sent to Process Building No. 1 for additional processing prior to shipment offsite as a commodity.
2. This process area is proposed for single stream commercial recyclables as of September 2016. The area is not currently in use.
3. The temporary trailer storage area will hold 30 trailers. Approximately 15 of the trailers will be loaded and 15 will be empty and awaiting removal from the site.



Resource Recovery Facility - Site Traffic Flow		
Gold Medal Environmental of DE, LLC 1000 S. Heald Street Wilmington, Delaware 19801		
Drawing No. TF-1	Revision No: 00	Date: 9/22/2016

COMPLIANCE PLUS SERVICES, INC. P.O. BOX 186 HATBORO, PA 19040 PHONE (215) 734-1414 * FAX (215) 734-1424 www.CPS-2Comply.com		Project No. 0338.02 Scale 1"=75' Approved By: Bradley J. Cunningham, P.E. Drawn By: Thomas Cunningham
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Attachment II

Recyclable Market Information and Data for Single Stream Recyclables

Table of End Market Users

End Market Users

End Market Users													
Company ¹			Material/Products										
	Newsprint	Cardboard	Mixed Paper	Sorted Office Paper	PET Plastic Containers	HDPE Plastic Containers	Bi-metal Containers	Aluminum Containers	Asphalt Shingles	LDPE Film	Aggregate Products	Wood	Drywall
American Chung Nam	X	X	X	X									
Newport CH	X	X	X	X									
Bear Island in VA	X	X	X	X									
Abitibi/Bowater	X	X	X	X									
Grief in VA		X											
Maryland Paper		X											
Rock Tenn		X											
Visy			X										
Cascades				X									
SCA				X									
Kruger				X									
Kimberly-Clark				X									
NURRC-Coca-Cola					X								
Mohawk					X								
Wellman					X								
Evergreen					X								
Clearpath					X								
Graham						X							
K W Plastic						X							
Envision						X							
Clean Tech						X							
Export						X							
AMG							X						
Tube City							X						
MMM							X						
Anheiser Busch								X					
Evermore/Alcoa								X					
National Paper													
Camden, NJ	X	X	X	X						X			
Greggo &											X		

End Market Users

End Market Users													
Company ¹	Material/Products												
	Newsprint	Cardboard	Mixed Paper	Sorted Office Paper	PET Plastic Containers	HDPE Plastic Containers	Bi-metal Containers	Aluminum Containers	Asphalt Shingles	LDPE Film	Aggregate Products	Wood	Drywall
Ferrara – Wilmington, DE													
Diamond Materials – Wilmington, DE									X		X		
Winzinger, Inc. – Hainesport, NJ											X		
WMP Engineered Fuel Facility Philadelphia, PA		X				X				X			
County Conservation – Sewell, NJ												X	
New Holland Mulch – New Castle, DE												X	
USA Gypsum – Reinholds, PA													X
EMR Camden, NJ							X						

¹End-use companies are subject to change as market fluctuates without prior notice to the Department.

N:\#0338 - Gold Medal\Resource Recovery Permit Renewal 1000 S Heald St 2016\Resource Recovery Permit Renewal 2016\End Market Users Chart.docx

Attachment III

Contingency Plan and Emergency Response Procedures

Gold Medal Environmental of DE, LLC

CONTINGENCY PLAN AND

EMERGENCY RESPONSE PLAN

September, 2016

Prepared for: Gold Medal Environmental of DE, LLC
1000 South Heald Street
Wilmington, DE 19801

Prepared by: Compliance Plus Services, Inc.
455 Business Center Drive, Suite 250
Horsham, PA 19044
215-734-1414

Table of Contents

1.0	CONTINGENCY PLAN AND EMREGENCY RESPONSE PROCEDURES.....	1
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1.1.1	Spills or Releases	1
1.1.2	Fires and Explosions	2
1.2	Notification and Alarm Procedures.....	4
1.2.1	Emergency Evacuation	6
1.3	Emergency Equipment	7
1.4	Post Emergency Evaluation and Return to Regular Operations	7

APPENDICES

Appendix A	Facility Site Plan Map
Appendix B	Emergency Evacuation Route Plan
Appendix C	Emergency Equipment Location Plan

1.0 CONTINGENCY PLAN AND EMERGENCY RESPONSE PROCEDURES

The Contingency Plan and Emergency Response Procedures (the “Plan”) detailed below are intended to establish the procedures and methods that will be employed at the Gold Medal Environmental Resource Recovery Facility (“Gold Medal”) in case of an emergency such as, a spill, accident or explosion. This Plan is also intended to satisfy the facility’s regulatory requirement specified under Section 4.4.1.3 of the Delaware Regulations Governing Solid Waste (“DRGSW”). A Facility Site Plan Map is provided as Appendix A.

1.1 Procedures to Prevent Spills, Releases and Fires

On a daily basis, site personnel should always be on the alert for potential emergency situations that would impact not only themselves, but other employees as well.

On-Site Emergencies are defined as any event that requires immediate action to be taken as the result of an uncontrolled, unexpected, or unscheduled event. Events include, but are not limited to: serious injuries, fires, explosions, material spills, releases of toxic materials including gases or fumes, loss of site power systems, equipment breakdowns, severe weather including floods or threat of floods or any other force or factor which may adversely affect operations or safety at the recycling facility.

Site-wide Emergencies are any On-Site Emergency that affects or has the potential to affect personnel or the environment outside of the normal work zones, and/or may require activation of the site evacuation procedure (see Section 1.2.1. below).

1.1.1 Spills or Releases

In the event of a spill or release situation, it is critical that Gold Medal prevent the escape of any spilled liquid or solid materials from entering into the environment, including the ground, air, groundwater or surface water, including any river, stream, or storm/sanitary sewer system. Spills or releases could result from a variety of factors, such as equipment or vehicle failure, human error, or unintentional releases.

A barrier must be erected immediately to prevent the escape of spilled or released materials. Containment of solids will be dependent on such factors as wind and other weather related conditions. The use of a tarpaulin or plastic sheeting over the spilled materials will aid in preventing the dispersion of solid material until such time as it can appropriately be remediated. Liquids may be contained by using absorbent booms, pads, or an effective absorbent material such as vermiculite or speedi-dry.

The source of the spill or release must be located and controlled as soon as possible after discovery. Once the spill or release is located, Gold Medal personnel will immediately contain it by the use of a berm, booms, pigs or other absorbent materials, so as to prevent

it from reaching any storm or sanitary sewers, streams or rivers. Once the source of the spill or release has been identified clean-up can begin.

Materials spilled on impervious surfaces should be absorbed with a compatible inert material such as speedi-dry or vermiculite. If the spill is on soil or any other pervious surface, the contaminated area must be excavated and contained in bags, drums, or roll-off containers.

All spill clean-up material must be properly classified, marked, labeled and prepared for shipment and disposal at an approved solid or hazardous waste facility.

1.1.2 Fires and Explosions

Gold Medal has established procedures to be used in the case of a fire or explosion. **If a fire or explosion occurs the Gold Medal Environmental Contingency Plan and Emergency Response Plan must be activated.** Gold Medal employees **should always call 911** in the case of a fire or explosion emergency.

In the case of a fire or explosion, an employee must report the fire **immediately** to the fire department by dialing **911**. Calling the fire department should be priority one before any employee attempts to extinguish the fire themselves. If the fire or explosion is beyond the capability of Gold Medal employees, **DO NOT ATTEMPT TO PUT OUT THE FIRE! LEAVE IT TO THE PROFESSIONALS.** Be prepared to give the following information to the fire department upon placing the notification phone call:

- Your exact location and the exact address of this facility;

1000 South Heald Street, Wilmington, DE 19801

- Type and size of fire, if known.
- If there are any known injuries to personnel.
- Your name, telephone number and number of injuries if known.
- Stay on the telephone until the Fire/Police Department tells you to hang up.
- Make sure to evacuate all personnel from the area. If the fire is electrical in nature an employee can cut power to the area as long as this procedure can be done without harm to anyone; an example would be to de-energize a circuit.

1.1.2.1 Before Operating a Fire Extinguisher

- Examine the fire extinguisher at the time of purchase for defects
- Read the operating instructions on the label.

- Make locations of extinguishers known. Refer to Gold Medal's Fire Extinguisher Location Map for details on the location of all on-site fire extinguishers. The map is located in Appendix C.
- Fire Extinguishers are easily distinguished throughout the facility using fluorescent orange covers, signs or special markings.

1.1.2.2 Follow These Steps to Operate an Extinguisher

- Remove the Fire Extinguisher from the mounting bracket: Grasp the unit by the carrying handle and base, and carry it to the location of the fire.
- Pull the locking pin to break the tamper seal. If the unit has a hose, remove the hose from the retaining clip.
- Move the extinguisher as close to the fire as possible. Grasp the hose in one hand and press or squeeze the handle or trigger release with the other. If the unit is a CO₂ extinguisher, grasping the plastic discharge horn may freeze the hand. If the unit has no hose, direct the stream of extinguishing agent by moving the extinguisher and aim it at the base of the fire.
- Use a side to side sweeping motion at the base of the flames starting from the near edge to the rear of the fire and then up the vertical surface.
- Use the pneumonic P.A.S.S. to help you remember how to use the extinguisher: P = Pull Pin, A = Aim at the base of the fire, S = squeeze the trigger, S = sweep from side to side.
- **Always leave an escape route when fighting a fire.**

1.1.2.3 Inspection and Maintenance of a Fire Extinguisher

Inspect units monthly to ensure extinguishers are in good working condition and able to provide adequate protection. The fire extinguishers should be rotated in order to keep the chemical from caking. An experienced fire extinguisher inspection contractor should be used to inspect the units on an annual basis.

1.1.2.4 Inspection Procedures

The following procedures should be followed when inspecting fire extinguishers:

- Are all extinguishers in their recommended location?
- Is there enough pressure to discharge the contents of the extinguisher? Check the gauge.
- Replace or recharge the units as necessary.
- Check to make sure the tamper seal is intact.
- Is the unit damaged in any way?
- Is the hose and nozzle unobstructed?
- Monthly inspections must be documented and maintained for a period of at least three (3) years as described in Section 8.2 of the Operations Plan.

1.1.2.5 Selecting the Proper Fire Extinguisher for the Job

The universal classification system has four designations for classes of fire extinguishers: Class A, B, C, and D. Extinguishers are marked with extinguishing rating capacity that are based on the size and type of fire to be extinguished and the class of fire that extinguisher is designated to address. A 20B rating is recommended for non-expert users. Combination extinguishers are suitable for more than one class of fire and are marked as such.

Class	Symbol	Type of Fuel
A	Green Triangle	Ordinary combustibles
B	Red Square	Flammable Liquids
C	Blue Circle	Electrical Equipment
D	Yellow Star	Combustible Metals

1.1.2.6 Fire Prevention

The following rules should be followed in order to prevent fires:

- Keep all work areas clean and free of debris and litter.
- Smoking is strictly forbidden in any part of the resource recovery facility except in the designated smoking area.
- All potential fire hazards should be reported immediately to the Operations Manager
- All electrical connections and wiring will be maintained adequately and in good operating condition.
- No flammable liquids will be used to clean the facility.

1.2 Notification and Alarm Procedures

In the event of an emergency such as a fire, explosion, spill, release, or serious injury, Gold Medal will implement the following notification and alert procedures to ensure that the proper actions are taken to address the emergency.

The first employee witnessing or responding to an incident involving an emergency spill or release of solid/hazardous waste, will contact Gold Medal's Primary Emergency Response Coordinator. If the Primary Coordinator is not available the Alternate Coordinator shall be notified. The following table lists the Gold Medal Primary and the Alternate Emergency Response Coordinators and their direct telephone numbers at the recycling facility:

List of Emergency Response Coordinators:

Coordinator Position	Coordinator Name	Telephone Number
Primary Emergency Response Coordinator	David DiEnno	Work: 302-660-4906 Home: 856-457-7110 Cell: 302-650-3666
Alternate Emergency Response Coordinators	Justin Blevin	Work: 302-656-2200 Home: 609-517-6415 Cell: 609-517-6415

Upon initial notification, the Emergency Response Coordinator will contact all employees regarding the emergency situation by use of handheld two-way radios. The Emergency Response Coordinator will also activate the emergency procedures as outlined in this Contingency Plan and Emergency Response Plan, and make the appropriate notifications to all Federal, State, or Local Agencies as required. DNREC will be notified if there is a spill or release of any hazardous substance into the environment in an amount that exceeds a Delaware Reportable Quantity (DRQ), as required in 7 DE Administrative Code 1203, Reporting of a Discharge of a Pollutant or Air Contaminant.

The following table lists the agencies to be contacted in the case of an emergency or release or spill of a solid/hazardous material or waste at the recycling facility:

Agency	Telephone Number
Local Emergency Agencies (Fire, Police, Ambulance)	911
<i>State of Delaware, Department of Natural Resources and Environmental Control Division of Air and Waste Management</i>	24 Hour Hotline: 1-800-662-8802 Local: 1-302-739-9401
National Response Center*	1-800-424-8802

*The National Response Center is only required to be notified if the incident involves the spill or release of a hazardous substance into the environment in an amount that exceeds a reportable quantity (see 40 CFR Part 302).

Gold Medal will furnish the following information to all agencies when notified:

- Name of person reporting the emergency or spill/release
- Name, telephone number and address of Gold Medal Environmental
- Date, time and location (within the facility) of the incident
- Type of vehicle or container or other equipment involved in the incident
- A brief description of the incident (what, when, where, etc.)

- How many employees were injured in the incident and type(s) of injury
- For any solid or hazardous waste spilled or released, including the following:
 - Name, address and phone number of the Generator or Supplier
 - Name of solid or hazardous waste spilled or released
 - Estimated quantity of the spill or release
 - Extent of spill/release

The Emergency Response Coordinator will coordinate with responding agencies during the emergency. Should the emergency or spill/release be beyond the scope of Gold Medal personnel capabilities, Gold Medal will contract with an outside Spill Clean-up Contractor in order to mitigate the situation as soon as possible.

Gold Medal will log each incident into a logbook and an incident number will be assigned to each entry that will serve as a unique identifier for future reference regarding the incident. An OSHA 300 log will be kept in order to document reportable injuries, illnesses or deaths that may occur during the incident.

1.2.1 Emergency Evacuation

The purpose of an Evacuation Procedure is to detail a course of action to be taken by all employees, contractors, and/or visitors that are on site during a site wide emergency.

The Emergency Response Coordinator will take the following steps during an emergency situation:

- Determine if and when a site evacuation is to be carried out;
- If an evacuation is necessary, make appropriate notifications immediately to the affected personnel;
- Arrange to be notified as it relates to site accountability for all administrative and yard personnel; and
- Inform responding agencies if any personnel are unaccounted for.

1.2.1.1 Notification

In the case of an evacuation order, employees will be notified verbally or by the use of a public address or other communication system at the facility. Notification must reach all employees both inside the administrative offices and out in the Main Process Building and facility yard areas.

1.2.1.2 Site Visitors

All site visitors will receive verbal instructions identifying areas of concern and evacuation routes. This is done to insure the safety of the visitor. Site visitors will be the responsibility of the individual with whom visitors are meeting.

1.2.1.3 Evacuation Routes

An Evacuation Map that identifies available evacuation routes and site rally points is located in Appendix B of this document. The Evacuation Map will be posted conspicuously throughout the facility.

1.2.1.4 Training

All employees must be trained on emergency evacuation in order to ensure that all employees and/or temporary site personnel are familiar with and respond to all aspects of this evacuation procedure. Gold Medal may employ the use of practical exercises or “drills” to further instruct, or prepare its staff in addition to the practical testing of the off-site notification system.

1.3 Emergency Equipment

The following emergency response equipment can be found at strategic locations throughout the resource recovery facility. First Aid kits are kept inside the administrative building.

- Fire Extinguishers
- Absorbent pads, booms, blankets, speedi-dry, vermiculite or other suitable absorbent materials
- Personal Protective Equipment
 - Safety Glasses
 - Hard Hats
 - Gloves
 - Steel toed safety boots/shoes
- Other Emergency Response Equipment
 - 55 gallon drums/overpacks
 - Shovels and other hand tools
 - Caution tape, cones or other means to designate a restricted area
 - Flashlights
 - First Aid Kits
 - Plastic Sheeting

All emergency equipment is tested and maintained as necessary to assure its proper operation at the time of an emergency. After use, all equipment is decontaminated, cleaned and determined whether it is fit to be placed back into service.

1.4 Post Emergency Evaluation and Return to Regular Operations

Before normal activities can be resumed, Gold Medal must be ready and equipped to handle another emergency. Gold Medal will ensure that all emergency equipment and supplies have been restocked and will replace any equipment that might have been damaged during the emergency. All equipment will be cleaned and refueled for future use.

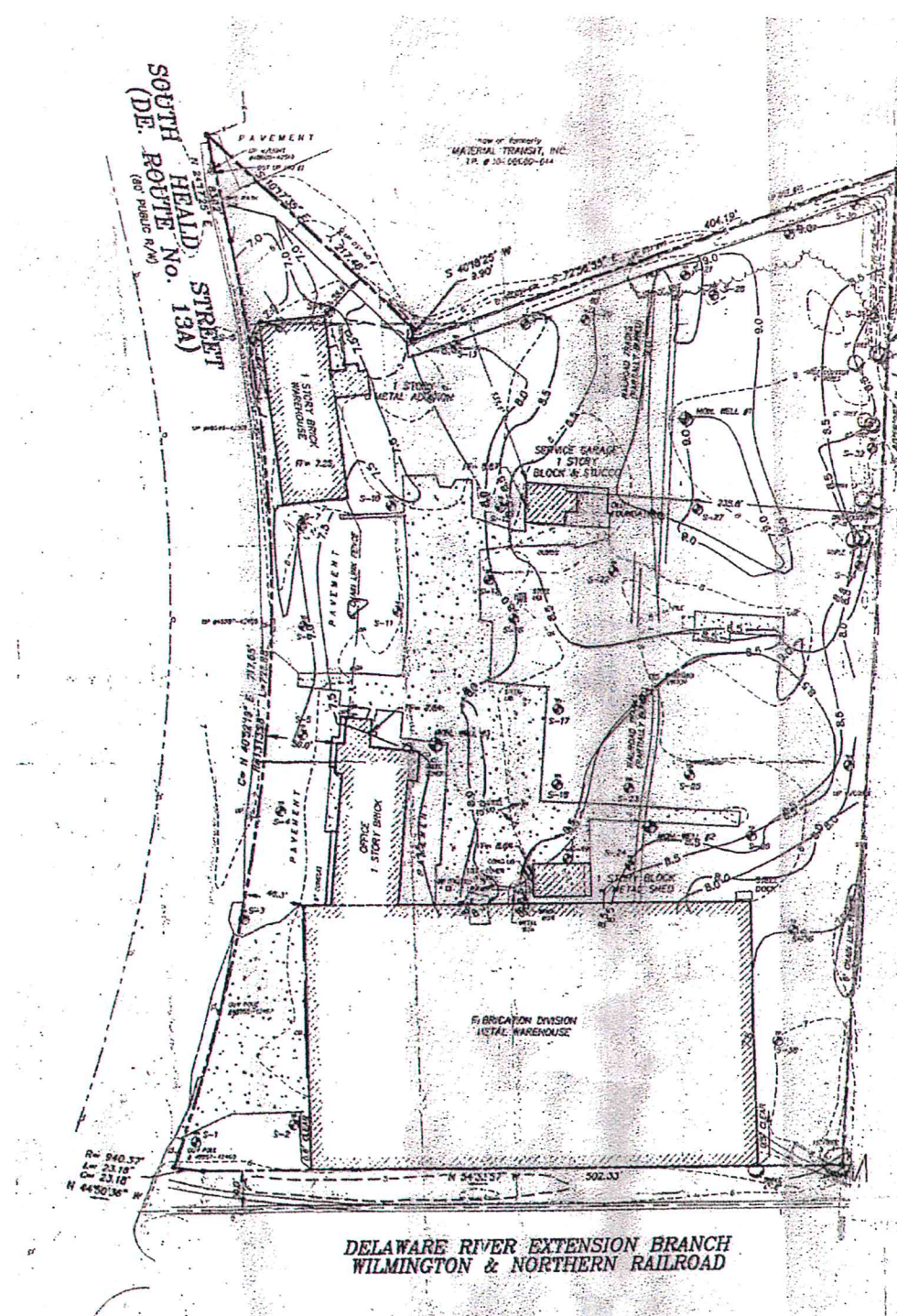
The Emergency Response Coordinator will prepare an Emergency Response Report after each emergency in order to assess the effectiveness of the Contingency Plan and Emergency Response Plan. Gold Medal may also review and revise its Contingency Plan and Emergency Response Plan based on the information in the report. Any written reports or documentation of events will be completed in accordance with the requirements specified in the Recordkeeping section of the Facility's Operations Plan.

N:\#0338 - Gold Medal\Resource Recovery Permit Renewal 1000 S Heald St 2016\Gold Medal Contingency and Emergency Response Plan 2016 Rev.0.doc

Appendix A

SP-1

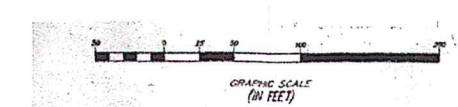
Facility Site Plan Map



- LEGEND:
- CONCRETE MONUMENT FOUND
 - FOUND REBAR
 - FOUND IRON PIPE
 - GATE POST
 - WATER METER
 - WATER VALVE
 - SEWER MANHOLE
 - UTILITY POLE w/ GUY WIRE
 - CONCRETE
 - CATCH BASIN
 - BRUSH LINE
 - WATER LINE
 - GAS LINE
 - SEDIMENT SAMPLE

- NOTES:
- OWNER:
 - TAX PARCEL No's: 10-001.00-047 & 10-001.00-048
 - SOURCE OF TITLE: DR. 366-277, DR. R-68-347 & DR. K-76-250
 - AREA = 12.046 ± ACRES
 - 2" HORIZ. BUILDING SETBACKS: 10' FRONT, 20' REAR
 - DATE OF FIELD SURVEY: APRIL 18, 1995
 - AS SCALED FROM THE NATIONAL FLOOD INSURANCE PROGRAM RATE MAP COMMUNITY PANEL NUMBER 105085 00350, REVISED SEPTEMBER 4, 1986, THIS PROPERTY LIES WITHIN ZONES 'A-S' & 'D'.
 - HORIZONTAL DATUM: NORTH AMERICAN DATUM, 1927.
 - VERTICAL DATUM: NATIONAL GEODETIC VERTICAL DATUM, 1929.
 - BENCHMARK: "MILLSIDE" - IN TRIANGULAR ISLAND AT INTERSECTION OF U.S. ROUTE 13, U.S. ROUTE 13-A AND ROGERS ROAD. ELEV = 24.957 (NGVD 1929)
 - SITE BENCHMARK: FOUND MONUMENT AT PROPERTY CORNER ON SOUTHERLY SIDE OF SHIPPING & HANDLING BUILDING. ELEV = 6.40 (NGVD 1929)

- NOTES:
- ORIGINAL DRAWING: "PROPERTY & TOPOGRAPHIC PLAN" BY G&F, PROVIDED BY BLUE RIVER RESOURCES OF NEW CASTLE, DELAWARE.
 - FLOOD ELEVATIONS ON THE FEMA FLOOD INSURANCE RATE MAP ARE REFERENCED TO THE NORTH AMERICAN VERTICAL DATUM OF 1988. THESE FLOOD ELEVATIONS MUST BE COMPARED TO STRUCTURE AND GROUND ELEVATIONS REFERENCED TO THE SAME VERTICAL DATUM. THE NATIONAL GEODETIC VERTICAL DATUM OF 1929 MUST BE CONVERTED TO THE NORTH AMERICAN VERTICAL DATUM OF 1988.

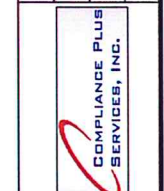


OWNER OF RECORD:
HEALD STREET, LLC
4048 NEW CASTLE AVENUE
NEW CASTLE, DE 19720

COMPLIANCE PLUS SERVICES, INC.
P.O. BOX 186
HATBORO, PA 19040
PHONE (215) 734-1414 • FAX (215) 734-1424
www.CPS-2Comply.com

Resource Recovery Facility - Site Plan
Gold Medal Environmental of DE, LLC
1000 S. Heald Street
Wilmington, Delaware 19801

Project No.
0338.02
Scale
As Noted
Approved By
Bradley J. Cunningham, P.E.
Drawn By
Thomas Cunningham



Drawing No. SP-1
Revision No. 0
Date: 09/28/2016





Appendix B

Emergency Evacuation Route Plan

Appendix C

Emergency Equipment Location Plan

KEY:

	FIRST AID KIT	
	FIRE EXTINGUISHER	
	SPILL KIT	FIGURE 1 FIGURE 2 FIGURE 3
	EYE WASH STATION	



 **Emergency**
epilepsy



EYE WASH STATION

FIGURE 1
FIGURE 2
FIGURE 3

Gold Medal Environmental of DE, LLC
1000 S. Heald Street
Wilmington, Delaware 19801

Drawing: Figure 4	Date: 09/28/2016
--------------------------	-------------------------

COMPLIANCE PLUS SERVICES, INC.
P.O. BOX 186
HATBORO, PA 19040
PHONE (215) 734-1414 * FAX (215) 734-1414
www.CPS-2Comply.com

Project No.	0338.02
Scale:	1" = 70 feet
Approved By:	Bradley J. Cunningham, P.E.
Drawn By:	Benjamin McGovern

**COMPLIANCE PLUS
SERVICES, INC.**

Attachment IV

*Gold Medal Environmental of DE, LLC
July 17, 2015 Resource Recovery Facility
Permit No. SW-03C17*



STATE OF DELAWARE
DEPARTMENT OF NATURAL RESOURCES
AND ENVIRONMENTAL CONTROL
DIVISION OF WASTE AND HAZARDOUS SUBSTANCES
SOLID AND HAZARDOUS WASTE MANAGEMENT SECTION

89 KINGS HIGHWAY
DOVER, DELAWARE 19901

TELEPHONE: (302) 739-9403
FAX: (302) 739-5060

August 10, 2015

Mr. James Sage, COO
Gold Medal Environmental of DE, LLC
1770 Hurffville Road
Deptford, New Jersey 08080

Subject: Permit Transfer from Blue River Resources, LLC to Gold Medal Environmental of DE, LLC

Reference: Gold Medal Environmental of DE, LLC, File Code: 02.B

Dear Mr. Sage:

The Delaware Department of Natural Resources & Environmental Control ("Department") Solid & Hazardous Waste Management Section ("SHWMS") is in receipt of a request from Blue River Resources, LLC ("Blue River") to transfer its resource recovery facility permit. The permit transfer request, dated April 23, 2015, identifies Blue River's intentions to have solid waste permit SW-03B17 for the Blue River Resources, LLC Resource Recovery Facility transferred to Gold Medal Environmental of DE, LLC ("GMED").

In a letter dated July 15, 2015, the Department explained that the permit request satisfied the Department's requirements except for documentation of the sale to GMED. With the submittal of the Confirmation of Closing Agreement dated July 17, 2015, the request has now satisfied all of the Department's requirements for a solid waste permit transfer. Pursuant to 7 Del. C. § 6003 and Delaware's *Regulations Governing Solid Waste* ("DRGSW"), Gold Medal Environmental of DE, LLC is hereby issued a permit to operate a materials recovery facility in order to accept, process, and store single stream recyclables and construction and demolition debris, for the purpose of recycling, at the above-referenced address, subject to the terms and conditions of this permit. This permit will expire on March 31, 2017.

If you have any questions, please contact Mindy Anthony at (302) 739-9403.

Sincerely,

Nancy C. Marker
Environmental Program Administrator
Solid and Hazardous Waste Management Section

NCM:MA:krc
GoldMedalPermitCovLtr02B 081715

Delaware's good nature depends on you!

Resource Recovery Facility Permit # SW-03C17

Effective Date: July 17, 2015

Expiration Date: March 31, 2017

Facility Name: Gold Medal Environmental of DE, LLC
Mailing Address: 1770 Hurffville Road
Deptford, New Jersey 08080

Primary Contact: Brian Schaffer, General Manager
(856) 340-1194

Alternate Contact: James Sage, Chief Operating Officer
(215) 727-7000

Location of Approved Activity: 1000 South Heald Street
Wilmington, DE 19801
Tax Parcel Number: 1000100047

I. GENERAL CONDITIONS

- A. Pursuant to 7 Del. C., Section 6003 and Section 4.1 of DRGSW, the Department hereby issues a permit for Gold Medal Environmental of DE, LLC to operate a materials recovery facility at 1000 South Heald Street in Wilmington, Delaware.
- B. This permit applies to the acceptance, processing, and storage of single stream recyclables and construction and demolition debris. At no point during acceptance, processing, or storage shall the single-stream recyclables be commingled with the construction and demolition debris, with the exception of combining the same types of waste recyclable materials after processing (for example, removing a plastic bottle from the construction and demolition debris waste stream and placing it in the single-stream recyclables.) The acceptance, processing, or storage of waste other than described above and herein is prohibited.
- C. This permit is issued based upon the information provided in the following submittals:
 1. Blue River Resources, LLC Permit Transfer Request received by DNREC on April 23, 2015;
 2. Letter of Intent from Gold Medal Environmental of DE, LLC and attached Environmental Permit Application Background Statement dated April 23, with additional information received on May 13, 2015;
 3. Permit Transfer Agreement between Blue River Resources, LLC and Gold Medal Environmental of DE, LLC, received by DNREC on May 13, 2015;

4. Financial Assurance: Performance Bond in the amount of \$172,875.00 dated June 12, 2015 and related documents;
5. Confirmation of Closing Agreement dated July 17, 2015 and received by DNREC on July 20, 2015;
6. *Resource Recovery Permit Application, Single Stream Recycling Facility, Blue River Resources, LLC*, Revised September 2011 and received by DNREC on September 21, 2011;
7. *Resource Recovery Permit Modification to Include New Recyclable Waste Materials, Blue River Resources, LLC*, dated December 2013 and received by DNREC on December 23, 2013.

D. This permit is issued subject to the following general conditions:

1. Definitions

The following terms are defined for the purposes of this permit:

- a. Single-stream recyclables means commingled recyclables, including paper, plastic, cardboard, metal, and glass that have been intentionally segregated from the waste stream by the generator for the purposes of recycling.
- b. Construction and demolition debris means waste resulting from the alteration, construction, demolition, remodeling, or repair of buildings, bridges, roadways, or other structures. For the purpose of this permit, the types of construction and demolition debris waste are limited to brick, block, stone, concrete, asphalt, asphalt shingles, wood/lumber, and drywall.
- c. Out-throws means wastes that are composed of either non-recyclable or low quality materials that have limited or no market value.

2. Access

Access to the facility by unauthorized persons shall be prevented by barriers, fences, and gates, or other suitable means. Representatives of DNREC may, at any reasonable time, enter the facility to verify compliance with the permit requirements, DRGSW, and 7 Del. C., Chapter 60.

3. Revocation or Suspension

This permit may be revoked or suspended upon violation of any condition of this permit, DRGSW, or 7 Del. C., Chapter 60.

4. Renewal

Per DRGSW Section 4.1.6, the permittee shall submit a permit application with all supporting documentation to DNREC at least one hundred and eighty (180) days prior to expiration if applicant desires to renew the permit.

5. Modifications

The Department may initiate modification of this permit if it finds that the existing permit conditions are either not adequate or not necessary to protect public health and the environment, as set forth in DRGSW Section 4.1.7.2. If the permittee desires to initiate a request for a major permit modification, the request shall be submitted to DNREC at least sixty (60) days prior to the desired implementation date.

6. Permit Availability

A copy of this permit and the *Operations Plan* shall be maintained at the facility and immediately made available to any Department representative upon request.

7. Permit Transfer

At least 90 days prior to the date of the proposed transfer, the permittee must submit all documentation required by DRGSW Section 4.1.8. The actual transfer

will be contingent upon the transferee's meeting all permit and regulatory requirements; until such time, the original permittee will remain liable for compliance regardless of who owns the facility.

8. Hours of Operation

The hours of operation for this facility are 24 hours/day, 7 days per week. However, the facility shall only accept recyclable waste materials from 6:00 a.m. until 6:00 p.m. Monday through Friday, and 7:00 a.m. until 12:00 p.m. on Saturday. In the event of an unforeseen circumstance (e.g., a severe weather event), the facility may request temporary written authorization from the Department to receive recyclable waste materials at times other than those specified above.

9. Odor Control

This facility shall not cause or allow the emission of an odorous air contaminant in such quantities as to interfere with any person's enjoyment of life or property. No odors shall be perceived beyond the property boundary.

10. Litter

Gold Medal Environmental of DE, LLC shall provide for litter removal and general cleanliness of the entire site to include the litter controls cited in Section 2.6.4 of the *Operations Plan*.

11. Vectors

The materials recovery facility shall be operated in a manner to prevent the establishment of habitats for nuisance organisms (such as flies, maggots, roaches, rodents, and similar vermin) and to mitigate nuisances and hazards to public health and the environment.

12. Dust Control

The materials recovery facility shall be operated in a manner to prevent dust emissions from causing a condition of air pollution (injurious to human, plant, or animal life or unreasonably interfering with the enjoyment of life and property). No dust generated from solid waste management activities shall be allowed to migrate outside of the facility boundaries.

13. General Maintenance

Good housekeeping practices shall be employed to protect public health and the environment and keep solid waste from accumulating onsite.

14. Health and Safety

- a. Employees at the site shall work under all appropriate health and safety guidelines established by the Occupational Safety and Health Administration.
- b. At a minimum, use of personal protective equipment shall be in accordance with 29 CFR Part 1910.132.
- c. First aid equipment shall be immediately available at the site.

15. Training

Gold Medal Environmental of DE, LLC shall ensure that all employees assigned with duties at the facility receive, at a minimum, the required training at the specified frequency listed in Section 6.0 of the *Operations Plan*.

16. Contingency

- a. Gold Medal Environmental of DE, LLC shall maintain capability to react to emergencies in accordance with the Contingency Plan and Emergency Response Plan (*Operations Plan*, Section 4, Attachment IV). Gold Medal Environmental of DE, LLC shall react to spills, fires, accidents, and

other emergencies so as to protect public health and safety and the environment.

- b. Gold Medal Environmental of DE, LLC shall maintain a current and correct list of emergency coordinators and emergency contact telephone numbers and shall notify the SHWMS within 5 business days of any changes therein. The most current list shall be prominently displayed in the office building and in the Main Process Building shown in Attachment I of the *Operations Plan*, Drawing No. SP-2. All operating personnel shall be informed of its location and function.
- c. Staff responsible for operations or emergency response at the facility shall be familiar with the Contingency Plan and Emergency Response Plan.
- d. Fire prevention and control shall be conducted in accordance with the *Operations Plan*.

II. OPERATIONS

A. Operations

- 1. Operations at Gold Medal Environmental of DE, LLC shall be conducted in accordance with all federal, state, county, and municipal environmental statutes, ordinances, and regulations, including, but not limited to: DRGSW, Delaware's *Regulations Governing Hazardous Waste*, Delaware's *Regulations Governing the Control of Water Pollution*, Delaware's *Surface Water Quality Standards*, and Delaware's *Regulations Governing the Control of Air Pollution*.
- 2. Operations at the material recovery facility shall be conducted in accordance with this permit and the Resource Recovery Permit Application, including the *Operations Plan* revised December 2013. Operations shall be conducted in a manner protective of public health and the environment.

B. Staffing

Sufficient numbers and types of personnel shall be available at the site to ensure capability for operation in accordance with DRGSW, the *Operations Plan*, and this permit.

C. Waste Handling:

All waste tipping, handling, and sorting operations shall be conducted within the Main Process Building. Processed materials that have been baled may be loaded on trucks via the overhead doors of the Main Process Building.

D. Daily Capacity

The materials recovery facility shall not accept more than 750 tons of recyclable waste materials during any single day. All incoming and outgoing loads shall be weighed by a certified weighmaster on a scale certified correct by the Delaware Department of Agriculture.

E. Storage

- 1. Capacity: The facility may store a maximum of 5,000 tons of recyclable waste materials (including processed, partially processed, and unprocessed waste materials).
- 2. Locations: All recyclable waste materials (including processed, partially processed, and unprocessed waste materials) shall be stored in one of the following locations:

- a. Storage Area 1 is located inside the Main Process Building and shall be utilized to store the majority of processed, partially processed, and unprocessed waste materials.
- b. Storage Area 2 is located outdoors and is limited to two (2) – 40 cubic yard roll-off containers of processed recyclable materials (i.e., recovered wood and recovered metal). One roll-off shall be designated for recovered wood and the other for recovered metal.
- c. Storage Area 3 is located outdoors and is limited to five (5) fully enclosed shipping containers (i.e., box vans, walking floor units, and/or overseas containers) of processed recyclable materials awaiting off-site shipment.

F. Acceptable Wastes

The recyclable waste materials accepted for processing at Gold Medal Environmental of DE, LLC are limited to:

1. Single-stream recyclables, as defined in Section I.D.1.a of this permit: The incoming single-stream recyclable waste materials may be mixed or separated into their individual components.
2. Construction and demolition debris, as defined in Section I.D.1.b of this permit: The incoming construction and demolition debris may be mixed or separated into their individual components.

G. Prohibited Wastes

Gold Medal Environmental of DE, LLC shall exercise reasonable care to ascertain whether waste accepted by the facility is prohibited waste, and shall not accept the following prohibited waste, including but not limited to:

1. Municipal solid waste, other than single stream recyclables and construction and demolition debris defined in Section I.D.1 of this permit.
2. Construction and demolition debris that is commingled with single-stream recyclables or other waste.
3. Recyclable waste materials that are components of the approved waste streams, but have not been intentionally separated by the generator for the purpose of recycling.
4. Liquid waste.
5. Infectious waste.
6. Hazardous waste, as defined in Delaware's *Regulations Governing Hazardous Waste*.

Reasonable care shall include contacting the waste transporter or individual generator if a visual determination regarding the acceptability of the waste material cannot be made. Prohibited wastes shall be immediately rejected following the procedures set forth in Section 4.1.4 of the *Operations Plan*. Additionally, the SHWMS shall be immediately notified in accordance with Condition III.D of this permit.

H. Waste Screening

All incoming loads of single-stream recyclables shall be unloaded in the Main Receiving Area and all incoming loads of construction and demolition debris shall be unloaded into the C&D Receiving Area, as described in Section 3 of the *Operations Plan*. Both the Main Receiving Area and the C&D Receiving Area are located indoors within the Main Process Building. Each incoming load will be visually inspected by facility operators for unacceptable waste when a vehicle is unloaded. Any unacceptable waste will be rejected in accordance with Section 4.1.4 of the *Operations Plan*.

I. Waste Processing

After being unloaded into the tipping and receiving area, the contents of the load will then be separated using sorting and separating equipment, including minimal hand sorting, as described in the *Operations Plan*.

J. Sorted Recyclable Materials

1. Single-stream Recyclables: Once processed into recyclable components, recyclable materials will be baled (with the exception of glass and non-balable metals) and stored, segregated by material type, in one of the three approved storage areas described in Section II.E.2 of this permit. Glass will be stored in separate concrete bunkers and non-balable metals will be stored in metal bins (e.g., roll-off containers) in one of the three approved storage areas described in Section II.E.2 of this permit.
2. Construction and Demolition Debris: Once sorted, the individual components of construction and demolition debris will be segregated and placed in concrete bunkers or metal bins (e.g., roll-off containers) in one of the three approved storage areas described in Section II.E.2 of this permit.
3. Sorted recyclable materials shall not be stored at the facility for greater than six (6) months. Gold Medal Environmental of DE, LLC must be able demonstrate the length of time recyclable materials have been stored onsite, as described in Section 4.3.2.2 of the *Operations Plan*.
4. At no time shall the total combined weight of the processed, partially processed, or unprocessed recyclable waste materials stored at the facility exceed 5,000 tons, as set forth in Section II.E.1 of this permit.

K. Out-throws

1. The percentage of out-throws, calculated on a calendar month basis, shall not exceed 20% for single-stream recyclables and 30% for construction and demolition debris. The percentage of out-throws shall be calculated at the end of each month. If it is determined that either of the out-throw percentage limits set forth above are exceeded, Blue River shall notify the SHWMS in writing no later than the 15th day of the following month.
2. Gold Medal Environmental of DE, LLC may store out-throws in the Main Process Building prior to shipment offsite for disposal for up to 30 days from the date of initial generation, provided the total weight of out-throws stored onsite does not exceed 500 tons. Out-throws that are capable of being baled shall be baled when Blue River reaches sufficient quantity to produce a full bale. If out-throws are not capable of being baled, they shall be segregated from any unprocessed, partially processed, or processed waste recyclable materials.

L. Operational Inspections

Daily operational inspections of the facility shall be conducted in accordance with Section 5.1.1 of the *Operations Plan*. Any deficiencies noted during the inspection shall be corrected as described in Section 5.1.2 of the *Operations Plan*.

III. REPORTING

A. Financial Assurance

No later than December 31st of each year, Gold Medal Environmental of DE, LLC shall submit an updated financial assurance document, as required in DRGSW Section 4.1.11. The submittal shall also include an updated estimate of the cost of third party closure of the facility which has been adjusted for inflation.

B. Annual Solid Waste Facility Report

No later than March 1st of every year, Gold Medal Environmental of DE, LLC shall submit an annual report to the SHWMS. This annual report shall summarize operations for the previous calendar year and include the following information:

1. Types and weight or volume of recyclable waste materials received at the site.
2. A list of any rejected loads and the reason for rejection.
3. Types and weight or volume of recyclable materials sent offsite and the name and address of the end market user.
4. Weight or volume of out-throws sent offsite and the location and ultimate disposal of the out-throws.
5. Summary of the percentage of out-throws generated each month.
6. A complete list of the commercial haulers that delivered recyclable waste materials to or removed solid waste from the site during the calendar year. The list shall include the transporter's Delaware solid waste transporter number, if the company has obtained a permit.
7. A discussion of the feasibility of recycling materials currently being received by the facility but that are not being recycled.
8. A summary of fires, spills or uncontrolled releases that occurred at the facility.
9. A description of any unintentional or accidental deviation from the approved *Operations Plan*.
10. A description of any construction or corrective work conducted at the site that was completed in accordance with an approved plan or to comply with a requirement under DRGSW.

C. Annual Recycling Report

In accordance with the Universal Recycling Law, specifically 7 Del. C. §6056(1), Gold Medal Environmental of DE, LLC shall submit an annual report detailing recycling activities no later than February 15 of each year. The report shall follow the reporting guidelines developed by the Department and the Recycling Public Advisory Council.

D. Emergency Reporting

1. Gold Medal Environmental of DE, LLC shall notify the SHWMS immediately (or, if after business hours, the Environmental Emergency toll-free hotline at 1-800-662-8802) in the event of:
 - a. A shut down that results in solid waste being diverted from the facility.
 - b. Fire or explosion at the facility.
 - c. Receipt of prohibited waste at the facility.
 - d. Any spill or non-permitted release.
2. Gold Medal Environmental of DE, LLC shall submit a written notification to the Department no later than five business days following any event requiring Emergency Reporting. The notification shall include the following:
 - a. Date and time of occurrence/discovery.
 - b. Date and time reported to DNREC. Include a reference number if reported to the Environmental Emergency hotline. When applicable, reports required to be submitted to the Department per Delaware's "Reporting of a Discharge of a Pollutant of Air Contaminant" regulations are in addition to and not in lieu of those herein.
 - c. Materials, quantities, and area involved. For spills or releases, include a sketch showing location and dimensions of the contaminated area.
 - d. List of agencies notified.

- e. Narrative describing how the incident occurred and actions taken by Gold Medal Environmental of DE, LLC and other response personnel to remedy the situation.
- f. Report of injuries and/or damage.
- g. Proposal for follow-up remedial actions including a schedule for implementation.

E. Noncompliance Reporting

Gold Medal Environmental of DE, LLC shall report any instance of noncompliance with this permit to the SHWMS within 5 business days. Gold Medal Environmental of DE, LLC shall take immediate action to correct the noncompliance.

F. Facility Changes

Gold Medal Environmental of DE, LLC shall report any changes of the company name, company ownership, or changes in management staff to the SHWMS immediately.

IV. RECORDKEEPING

- A. The following information shall be recorded and the records retained by Gold Medal Environmental of DE, LLC for at least three (3) years. The information shall be kept onsite and made immediately available to DNREC for review upon request.
 - 1. A record of the type and weight of recyclable waste materials received at the site each day.
 - 2. A record of the type and weight of recyclable materials sent offsite each day and the name and address of the end-market user to which the recyclable materials were shipped.
 - 3. A record of the weight and percentage of out-throws generated by the facility, as described in Section 8.1 of the *Operations Plan*.
 - 4. A record of any rejected loads and the reason for rejection.
 - 5. A record of the transporters (company name, address, telephone number, and solid waste transporter number, if applicable) delivering recyclable waste materials to the facility or removing solid wastes from the facility.
 - 6. A record of fires, spills, explosions, and uncontrolled releases that occurred at the facility.
 - 7. Operational inspection records, as required by Section 8.2 of the *Operations Plan*.
 - 8. Training records, as required by Sections 6.0 and 8.2 of the *Operations Plan*.
 - 9. Records of any odor, litter, vector or dust complaints received by Gold Medal Environmental of DE, LLC concerning the facility.
 - 10. Any additional records identified in Section 8.0 of the *Operations Plan*.
- B. A copy of the most current version of this permit shall be maintained at the facility and made immediately available to DNREC representatives upon request.

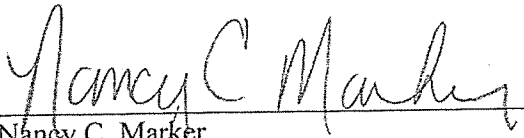
V. CLOSURE

- A. At least 180 days prior to the date when recyclable waste materials will no longer be accepted, Gold Medal Environmental of DE, LLC shall submit the following for DNREC approval:
 - 1. Written notification of Gold Medal Environmental of DE, LLC's intent to close the facility.
 - 2. An updated closure plan, including a detailed description of the methods, procedures, and processes to be used to clean and close the facility.

3. An updated estimate of the third party cost of closing the facility.
 4. The closure schedule.
- B. Closure of the facility shall meet the closure requirements set forth in DRGSW.

MODIFICATIONS:

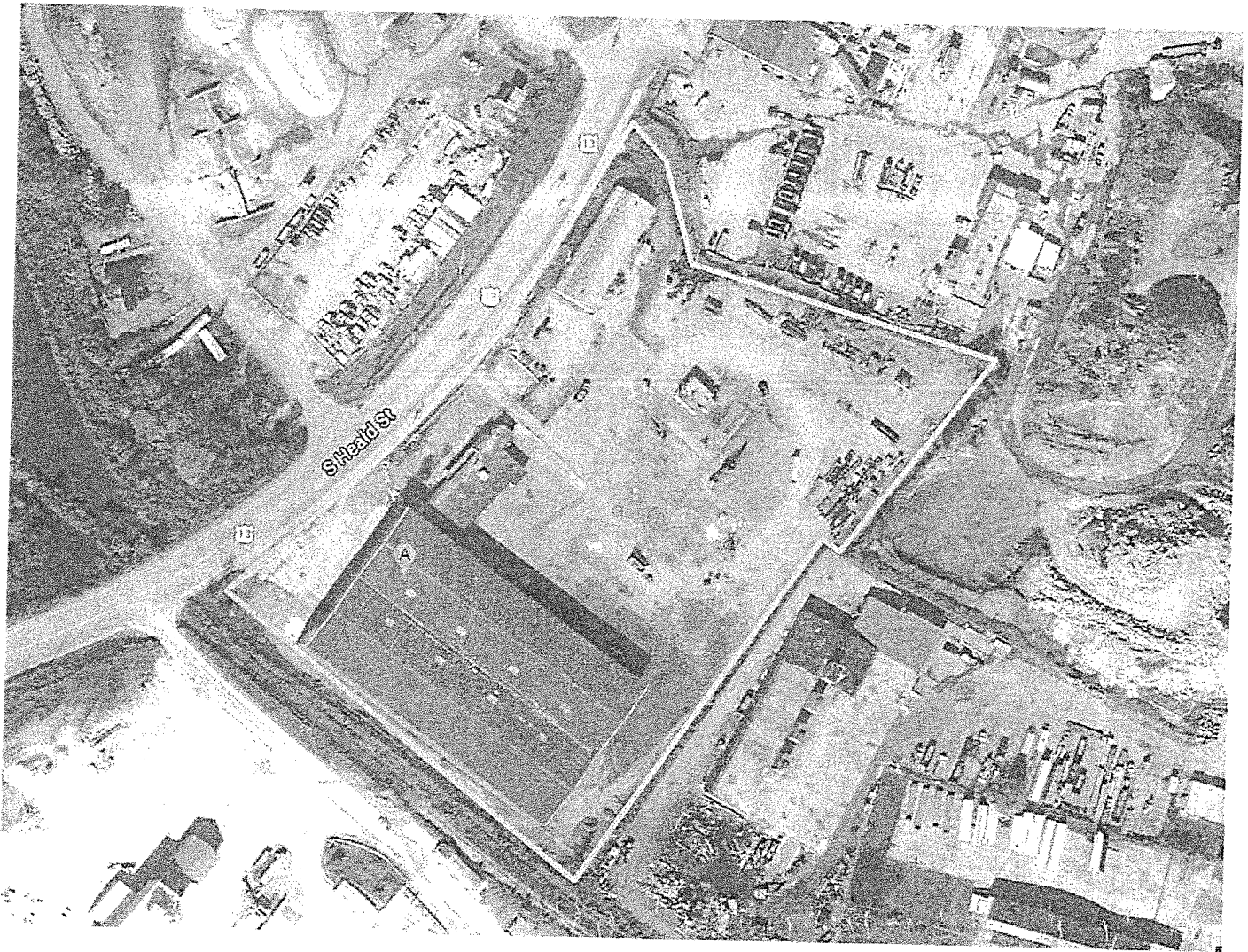
April 1, 2014: Modified to allow the acceptance and processing of construction and demolition debris.
July 17, 2015: Modified to reflect transfer of ownership of the resource recovery facility.



Nancy C. Marker
Environmental Program Administrator
Solid and Hazardous Waste Management Section

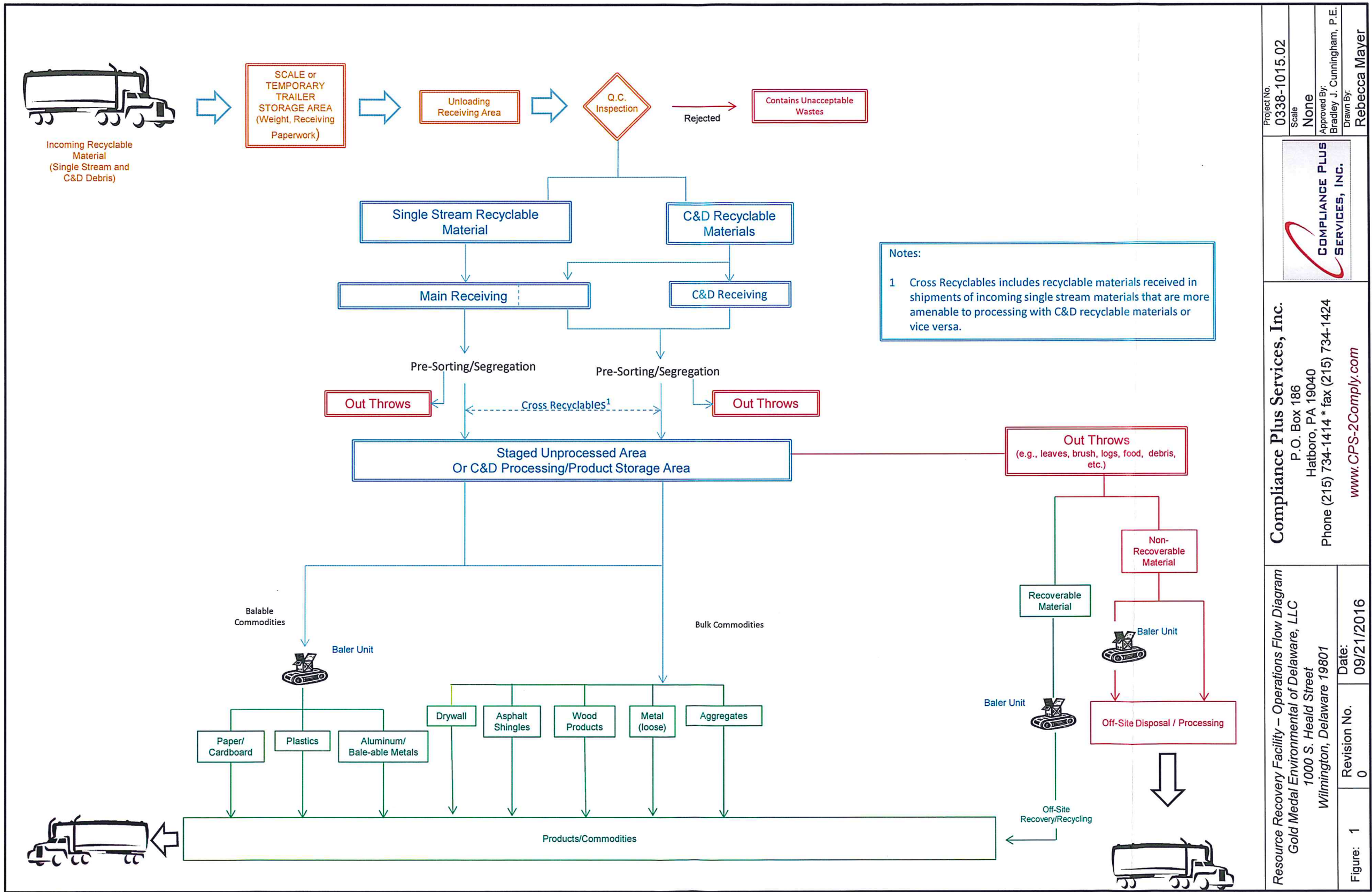
7-17-15
Date

Gold Medal Environmental of DE, LLC
1000 South Heald Street
Wilmington, DE 19801
Facility Boundaries



Attachment V

Process Flow Diagram



Attachment VI

Daily Facility Inspection Report

GOLD MEDAL ENVIRONMENTAL OF DE, LLC

DAILY FACILITY INSPECTION REPORT

INSPECTOR: _____
 DATE OF INSPECTION: _____
 TIME OF INSPECTION: _____

DAILY FACILITY INSPECTION REPORT					
Inspection Item	Acceptable		Observations/Comments	Corrective Actions Taken	Date Completed
	Yes	No			
STORAGE AND PROCESSING AREAS					
<p><u>Storage Locations:</u> All recyclable materials and commodities must be stored properly in approved storage locations/containers. The Processing Buildings, outside storage area, receiving area, processing areas and the outside yard should be neat and free of clutter.</p> <p><u>Storage:</u> Onsite storage does not exceed the following:</p> <ul style="list-style-type: none"> • Total combined tonnage of commodities stored may not exceed 5,000 tons. • Recycled commodities shall not be stored for more than 6 months. • Unbaled out-throws may not be stored for more than 3 days onsite. • Baled out-throws may be stored up to 30 days. • Out-throws stored onsite may not exceed 500 tons. (During unforeseen outages recyclable material shall not be stored for more than 30 days.) <p><u>Dust Control Management:</u> Roadways and/or other areas of the facility must be operated such that they will not produce dusts that create a nuisance beyond the property boundary.</p>					

DAILY FACILITY INSPECTION REPORT					
Inspection Item	Acceptable		Observations/Comments	Corrective Actions Taken	Date Completed
	Yes	No			
Odor Controls: Odors must not be present outside the Main Processing Building that could create a nuisance beyond the property border.					
Rodents/Pests/Insects: The Processing Buildings and any associated storage areas as well as the facility grounds should be free of rodents, pests or insects in such quantities as to create a nuisance. Infestation of these types should be reported immediately.					
Litter Control: The site should be free of trash, debris, or any other types of litter at all times.					
Fencing/Barriers: The fencing, gates, and barricades surrounding the facility should be free of damage and/or deterioration. Fencing and/or barriers should be properly maintained.					
Spills or Leaks: Storage and processing areas must be inspected to ensure that there are no visible signs of spills or leaks.					

ADDITIONAL OBSERVATIONS AND NOTES: _____

Attachment VII

*Forms and Documentation for Procedures
for Pre-Qualification and Acceptance of
Suspected Asbestos-Containing Materials
(i.e., Asphalt Shingles/Drywall)*

*Pre-Approval/Certification Form For
Suspected Asbestos-Containing Materials
(e.g., post-consumer asphalt
shingles/drywall)*

**Suspected ACM
Pre-Approval/Certification Form
Gold Medal Environmental of DE, LLC - Resource Recovery Facility**

<u>Customer Information</u> Billing Name: _____ Billing Address: _____ _____ Contact Name: _____ Telephone No: _____ (Office) _____ (Cell) _____ (Fax)	<div style="border: 1px solid black; padding: 2px; text-align: center;">For Gold Medal Use Only</div> Reviewed by: _____ (Initials) Approval No.: _____ Comments/Notes: _____ _____
<u>Suspected Asbestos-Containing Material (ACM)</u>	
<p>Suspected ACM (e.g., post-consumer asphalt shingles/drywall) must be sampled and analyzed for asbestos in accordance with the procedures specified by the State of Delaware and U.S. EPA guidance for sampling and analysis is provided in Gold Medal's <i>Suspected ACM Sampling and Analysis Information Sheet (SAIS)</i>.</p>	
Generator Site/Owner: _____ Address: _____ _____ _____	Is the Property: (check one) <input type="checkbox"/> Residential <input type="checkbox"/> Commercial <input type="checkbox"/> Industrial
Description of Waste Materials: _____ _____	
<i>Asbestos Certification (*Required for All Suspected ACM):</i>	
<p>Sampling and analysis of suspected ACM must be completed by the Generator/Contractor prior to acceptance by Gold Medal consistent with the procedures specified by the State of Delaware and U.S. EPA as outlined in the SAIS.</p> <p>Is an EPA Notification of Demolition or Renovation Form or a State of Delaware Asbestos Inspection Form attached? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Are results of any analysis completed attached? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Certification: I certify the information included in this Suspected ACM Pre-Approval/Certification Form is true and accurate. I further certify that, representative samples were collected by a qualified and trained individual and analyzed of the Post-Consumer shingles/drywall referenced above in accordance with Gold Medal's Asphalt Shingles/Drywall SAIS Form, and based on the results obtained, the asphalt shingles/drywall are not classified as asbestos-containing waste material as defined in 40 CFR Part 61 Subpart M.</p> <p style="text-align: center;">Generator/Contractor Signature: _____ Date: _____</p>	

*Suspected Asbestos-Containing Material
Daily Receipt Log Form*

Suspected ACM Daily Receipt Log
(for Post-Consumer Asphalt Shingle/Drywall Shipments)
Gold Medal Environmental of DE, LLC, 1000 South Heald Street, Wilmington DE 19801 Phone: (302) 625-3150

Date Received	Generator Name	Approval Number	Transporter/Contractor	Description of Waste	Shipment Qty (in tons) *	Comments (Note: If any shipment, or portion of shipment is rejected; indicate reason for rejection, using this space to indicate any other special considerations)

Assumes 2 cubic yard = 1 ton

*Suspected Asbestos-Containing Materials
Sampling and Analysis Information Sheet*

Suspected ACM Sampling and Analysis Information Sheet

Gold Medal Resource Recovery Facility

Asbestos was widely used in home and commercial construction materials through the mid-1970s. One of the most commonly known uses for asbestos materials was in roofing shingles or tiles. A home built or renovated anytime before the 1980s may have roofing shingles that could contain regulated amounts of asbestos. Similarly, asbestos may also be found in drywall (i.e., wall board and associated joint and spackling compounds). Since that time, most manufacturers have sought out alternative materials for asbestos roofing shingles and drywall materials such that these materials are extremely uncommon in newer buildings.

While roofs made with asbestos or transite roofing shingles were commonly called “asbestos roofs,” the truth is that most contain less than 30 percent asbestos fibers. However, any materials that have 1% or greater asbestos by weight are classified as “asbestos-containing materials,” (“ACM”) or “asbestos containing waste materials” (“ACWM”). Transite, the most common type of asbestos roofing tiles, was made with Portland cement and asbestos fibers, often with other fibers and materials added. For additional information concerning the proper handling and disposal of asbestos-containing shingles and other possible ACWM, contact the U.S. Environmental Protection Agency (EPA) or the Delaware Department of Natural Resources and Environmental Control (DNREC).

Requirements For Acceptance:

Gold Medal requires all suspected ACM to be inspected and analyzed in accordance with State and Federal regulations before being accepted for recycling at its facility. Gold Medal cannot accept asbestos-containing waste material (ACWM), fiber glass and other insulation materials, liquid materials (e.g., paints, oils, roofing tars, etc.), floor tiles or siding. Any suspected ACM/ACWM, such as post-consumer shingles/drywall, will not be accepted unless adequate documentation shows the materials do not contain greater than 1% asbestos by weight.

Sampling and Analysis must be completed by the Generator/Contractor as follows:

Under both Federal and Delaware State regulations, prior to demolition or renovation activities at a facility, as defined under 40 CFR 61 Subpart M, an owner must thoroughly inspect the facility, or part of the facility where the demolition/renovation will occur, for the presence of asbestos. In Delaware, the inspection must be performed by a Licensed State of Delaware Asbestos Field Technician employed by a Licensed State of Delaware Professional Service Firm. This inspection must include a thorough visual inspection as well as representative sampling of all suspected ACM materials. The results of this inspection and sampling are required to be reported using U.S. EPA’s Notification of Demolition or Renovation Form and/or the State of Delaware Asbestos Inspection Form for projects in demolition/renovation in accordance with Federal and State requirements. A copy of the form(s) and any relevant sampling data should be provided to Gold Medal with the Suspected ACM Pre-Approval/Certification Form.

Sample collection should only be performed by a qualified and trained individual consistent with applicable requirements specified by the State of Delaware. These instructions are only intended to provide guidance for the certification of suspected ACM to demonstrate that adequate evaluation of the material was completed prior to acceptance.

Analysis:

Samples are to be analyzed using a polarized light microscopy (PLM) EPA test method 600/R-93-116, or an equivalent method approved by the State of Delaware or U.S. EPA. Testing should be completed by an accredited laboratory registered under National Voluntary Laboratory Accredited Laboratory Program, (NVLAP) (<http://ts.nist.gov/Standards/scopes/plmtm.htm>). A few examples of accredited testing laboratories are provided below.

Asbestos Analytical Laboratories:

Criterion Labs	EMSL Analytical, Inc.	Environmental Testing, Inc.
Bensalem, PA	Westmont, NJ	Middletown, DE
(215) 244-1300 x 26	(856) 858-4800	(302) 378-9881
Contact: Mike Panepresso	Contact: Gary Perlmutter	Contact: LeeAnn Shinaberry

Please contact any one of these laboratories for additional sampling instructions, proper bottleware for sample collection, sample transportation equipment and required custody paperwork.